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Naval Facilities Engineering Command

**ENGINEERING SERVICE CENTER**  
Port Hueneme, California 93043-4370

**TECHNICAL REPORT**  
**TR-2254-ENV**

**FACILITIES MANAGEMENT GUIDE FOR**  
**ASBESTOS AND LEAD**


by

Navy Lead Hazard Reduction Steering Committee  
NAVFAC TSCA Workgroup

November 2004

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**PREFACE:** This guidance document was developed by the Navy Lead Hazard Reduction Steering Committee (LHRSC) to aid Public Works Departments and Facility Managers. The document was originally developed by Engineering Field Activity Northeast for regional use, but has been revised and expanded to be applicable Navy-wide.

The guide provides a summary of asbestos and lead requirements that routinely impact facilities operations. The format follows a logical sequence of work processes in a Public Works Department. The overall intent is to ensure protection of our workers, building occupants, and the environment.

Members of the Navy LHRSC included representatives from Naval Facilities Engineering Command (NAVFACHQ), Commander Navy Facilities (Housing), Naval Facilities Engineering Command Atlantic Division (NFECL), Naval Facilities Engineering Service Center (NFESC), Engineering Field Activity Northeast (EFA NE), Engineering Field Activity Northwest (EFA NW), Naval Environmental Health Center (NEHC) and Public Works Center Norfolk.

The final version of this guidance document is approved and issued by the NAVFAC Toxic Substance Control Act Working Group (TSCA WG). Members of the TSCA WG include representatives from Naval Facilities Engineering Command Atlantic Division (NFECL), Naval Facilities Engineering Command Pacific Division (NFECP), Naval Facilities Engineering Command Southern Division (NFECS), Naval Facilities Engineering Command Southwest Division (NFECSW), Naval Facilities Engineering Service Center (NFESC), Engineering Field Activity Northeast (EFA NE), Engineering Field Activity Northwest (EFA NW), and Engineering Field Activity Chesapeake (EFA CHES).

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# 1.0 OVERVIEW

The purpose of this guide is to assist Public Works Officers and Departments in the management of asbestos and lead containing building materials and architectural coatings, while ensuring the protection of workers, building occupants, and the environment. Though asbestos and lead hazards are primarily Navy Occupational Safety and Health (NAVOSH) and Environmental Program issues, virtually all Public Works Department programs and projects are affected, including: maintenance control, engineering, various shops, service and construction contracts, building material purchases, and credit card purchases. There are other industrial and military unique applications that may use asbestos or lead, which are not considered in this guide. As well, other environmental concerns with asbestos and lead, such as drinking water criteria, are also not included.

The Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency (EPA) regulate asbestos and lead. The regulations of these agencies maintain the presumption that most building materials contain asbestos, that paints contain lead, and that these materials are not to be disturbed without special worker and environmental precautions. OSHA regulations focus on worker protection, training, and work practices. EPA regulates asbestos and lead training, material handling, waste disposal, and various notification and recordkeeping requirements. Additional regulations apply specifically to pre-1978 housing and child-occupied facilities when lead-based paint is present and the property is being transferred. State and local governments may have additional, more stringent requirements.

In general, Navy policy is to manage asbestos-containing materials and lead-based paint in place, provided they are in good condition and will not be disturbed. The Navy policy for use, handling, maintenance, and removal of materials containing asbestos or lead is contained in OPNAVINST 5100.23 series, *Navy Occupational Safety and Health (NAVOSH) Program Manual*. Further guidance for lead-based paint has been issued through the Naval Facilities Engineering Command (NAVFAC) Housing Program and Design Policy Letters.

This guide is organized into an asbestos and lead section. Each section addresses a facilities-oriented summary of pertinent regulatory requirements and Navy policy. Following the regulatory discussion, the regulations and policies are discussed as they apply to typical Public Works Department. Funding discussions are also included to address the variable sources that may apply. There are also asbestos and lead management matrix charts to provide a quick reference guide of topics, provisions, and actions required to protect workers, building occupants and the environment. A facilities checklist and discussion are provided to plan work or projects. A facilities flow chart is provided to illustrate the facilities process as applicable to asbestos and lead compliance. Appendix A provides an Architectural/Engineering firm design guide and scope of work, Appendix B includes internet web site information, Appendix C lists Navy resource points of contact, and Appendix D is a Glossary of terms.

## 2.0 ASBESTOS

Asbestos was used in more than 3,000 commercial products due to its excellent heat and acid resistant properties, and electrical nonconductivity. Numerous building materials may contain asbestos, such as: roofing, siding, flooring, plasters, joint compound, mastics, ceiling panels, caulking, glazing, putty, sealants, textured and roofing paints, high voltage electrical insulation, pipe and boiler insulation products, and gaskets. Asbestos-containing materials (ACM) are a health hazard primarily when the asbestos fibers become airborne. These airborne fibers are invisible to the naked eye. Long-term exposures to such fibers have been associated with certain diseases that may take 20 years or more to develop.

This section of the guide provides Federal regulatory requirements, Navy policy, and technical guidance for asbestos. The activity Occupational Safety and Health (OSH) and Environmental Departments, or Engineering Field Division/Activity (EFD/A) Safety and Environmental Office points of contact in Appendix C, can provide additional clarification and technical support for these requirements.

### 2.1 GENERAL REQUIREMENTS

#### 2.1.1 Federal Regulatory Requirements

Both the EPA and OSHA regulate asbestos. The EPA regulations focus on minimizing releases to the public and the environment during renovation and demolition, worker training and accreditation, and asbestos waste disposal. OSHA regulations cover worker safety and protection of building occupants. EPA and OSHA may actually differ in their requirements for sampling, handling and disposal of certain asbestos materials. A thorough reading of the regulatory text is necessary to ensure full compliance.

2.1.1.1 40 CFR 61 Subpart M - National Emission Standard for Asbestos. The National Emission Standard for Asbestos is a subpart to a broader class of Clean Air Act requirements under the National Emission Standards for Hazardous Air Pollutants (NESHAPs). The Asbestos NESHAP is primarily concerned with the application, renovation, demolition and disposal of asbestos-containing material (ACM). The regulation defines ACM as containing greater than 1% asbestos as measured by polarized light microscopy. The Asbestos NESHAP requirements include:

- project specific surveys
- written notification prior to renovation or demolition work
- destructive testing for demolition (or renovation with demolition)
- wetting of ACM during removal
- proper disposal of waste, including Waste Shipment Records

2.1.1.2. 40 CFR 763 Subpart E, Appendix C - Asbestos Hazard Emergency Response Act (AHERA), Model Accreditation Plan (MAP). While the 40 CFR 763 regulations state that they are only applicable to schools, kindergarten through 12<sup>th</sup> grade, the 1990 reauthorization extended accreditation requirements of the MAP to include personnel in public and commercial buildings. The MAP outlines training and accreditation requirements for inspectors,

management planners, project designers, abatement supervisors, and abatement workers. Only accredited persons are allowed to:

- collect bulk samples
- design projects (prepare/review plans & specs)
- remove asbestos
- supervise asbestos removal projects

AHERA also outlines the training required for custodial and maintenance workers who may disturb ACM or work in buildings with ACM (40 CFR 763.92(a)).

2.1.1.3 29 CFR 1926.1101 Construction Industry Standard, Asbestos. OSHA's construction industry standard covers employees engaged in construction and demolition, as well as the following related activities which are likely to involve asbestos exposure: removal, encapsulation, alteration, repair, maintenance, renovation, installation, insulation, spill/emergency clean-up, transportation, storage and disposal of ACM.

In general, the construction industry standard includes requirements for:

- training (equivalent to training requirements of EPA/AHERA)
- engineering controls
- work practices
- "presuming" materials to contain asbestos unless testing confirms otherwise
- notification by building owners to employees of the presence of asbestos in their work areas prior to removal

2.1.1.4 29 CFR 1910.1001 General Industry Standard, Asbestos. Employees performing maintenance activities that are not associated with construction work, such as custodial and maintenance personnel, are covered by the general industry standard for asbestos. Building owners are required to notify employees of the presence of asbestos in their work areas.

## **2.1.2 Navy Policy and Guidance**

2.1.2.1 OPNAVINST 5100.23 Series, Navy Occupational Safety and Health (NAVOSH) Program Manual. Chapter 17 of the OPNAVINST 5100.23 Series manual outlines the Navy Asbestos Management Program Ashore. The program is made up of the following three critical elements:

- Survey and material evaluation/ condition assessment of accessible asbestos in buildings
- Operations & maintenance (O&M) program including in-place management, training, re-inspection, recordkeeping, etc.
- Design and abatement of hazards

The pertinent facilities management aspects of the asbestos program are:

- Actively manage undamaged ACM in place, and maintain in good condition. Repair or remove damaged ACM.

- A clearance level of 0.01 fibers per cubic centimeter in air has been established for all types of buildings to ensure that occupants are protected from exposure. (paragraph 1705)
- A chart is included that outlines the job specific training requirements of EPA, OSHA and the Navy. (Appendix 17-B)
- Unified Facilities Guide Specification (UFGS) 13281N, “Engineering Control of Asbestos-containing Materials,” is required for all contracted construction work. (paragraph 1711)
- Commanding Officers are required to appoint an Asbestos Program Manager (APM), responsible for carrying out the Asbestos Management Program Ashore. The APM may be located in the Public Works (PW), Environmental or OSH Departments. (paragraph 1707)
- An Asbestos Medical Surveillance Program has been established for all personnel exposed at or above the OSHA permissible exposure limit. (paragraph 1710)

The Navy program provides flexibility for each activity to determine the department in which the APM will reside. Regardless of the APM location within your command, **effective coordination among PW, Environmental, the OSH Department, and the Contracting Officer is required to ensure proper management of asbestos-containing materials.**

2.1.2.2 Unified Facilities Guide Specification (UFGS) 13281N, Engineering Control of Asbestos-containing Materials. This guide specification covers safety procedures and requirements for the demolition, removal, encapsulation, and disposal of ACM performed by contractors. OPNAVINST 5100.23 Series requires use of the guide specification for design of asbestos actions in Navy facilities. Use UFGS 13281N to ensure project designs comply with regulatory requirements.

2.1.2.3 COMNAVFACENGCOM ltr 11101, FAC 08T/1822B of 9 NOV 1992, Navy Family Housing Lead-Based Paint/Asbestos Inventory Program. In FY93, NAVFACENGCOM began worldwide asbestos and lead-based paint inspection of Navy family housing. The goals of the inventory were to locate asbestos-containing material and lead-based paint, determine its condition, assess potential health risks to occupants, and develop techniques to reduce the cost of managing and abating asbestos and lead-based paint in housing. As a result, each activity received community specific Asbestos Management Plans and an Asbestos Activity Summary. Housing Departments maintain copies of these plans. Worldwide inspection results are maintained at Navy Public Works Center, Norfolk. Copies of these plans, and their associated impact on Navy Housing units, are available via the **EHS Manager**, which can be accessed from [www.myhsg.navy.mil](http://www.myhsg.navy.mil).

## **2.2 ASBESTOS MANAGEMENT IN FACILITIES**

This section relates the regulations and Navy guidance to various Public Works functions such as maintenance, repair, renovation and demolition work. An asbestos management matrix, summarizing key facility-related requirements, provisions, and actions; and a pre-work checklist are provided at the end of this section.



### **2.2.1 Maintenance Control**

Compare facilities work requests to existing asbestos inventories and surveys to determine if ACM will be disturbed. The activity asbestos survey can provide valuable information that may reduce renovation/demolition project specific survey costs by 50-75%. Note that the activity survey provides only a baseline for accessible asbestos, and does not provide adequate information when destructive testing is required.

In general, if a material is not wood, glass, or metal, it may contain asbestos. Where asbestos will be disturbed, remove the asbestos first (or in conjunction with lead-based paint) to allow other trades to work freely. Thermal system insulation and surfacing materials (fireproofing, acoustical and decorative finishes) have a particularly high potential for fiber release and subsequent exposure to building occupants.

When no data are available, presume building materials contain asbestos per 40 CFR 61 Asbestos NESHAP and OSHA 29 CFR 1926.1101 regulations; and implement protective work practices, procedures, and personal protective equipment. If testing is conducted, ensure that only EPA accredited personnel collect bulk samples of suspected ACM. Provide planners and estimators with all asbestos information to assist in developing a project scope of work or in-house job plan. Computer-aided design (CAD) drawings and Geographical Information Systems (GIS) are powerful tools for facilities asbestos management, project planning, estimating, and recordkeeping. The activity APM should review or assist in development of all contracted and in-house projects, and perform design reviews for all activity and EFD/A developed projects involving asbestos removal.

### **2.2.2 In-house Asbestos Work –O&M or Large Project**

Develop a written Standard Operating Procedure (SOP) or compliance plan for in-house asbestos work as indicated in OPNAVINST 5100.23 Series, Chapter 17. For incidental disturbance, the National Institute of Building Sciences (NIBS) guidance manual, *Asbestos Operations & Maintenance Work Practices*, describes standardized procedures that may be useful. Activity APMs should have this manual; else information for ordering the manual is available on the Construction Criteria Base (CCB) web site at <http://www.ccb.org>.

Provide asbestos removal personnel with EPA/AHERA accredited training. Specific training requirements are tiered based on the type of work performed. Ensure a trained supervisor is present for large-scale removal work, per 40 CFR 61.145 Asbestos NESHAP. Note that annual refresher training is required.

Use specialized equipment for in-house removal work such as High Efficiency Particulate Air (HEPA) filtration devices (1,000 – 2,000 cubic feet per minute rating), HEPA filtered vacuum cleaners, and a portable shower decontamination unit. Determine additional equipment needs based on the project.

Submit project notification to the EPA, State, or local air management district at least 10 working days prior, when it is anticipated that asbestos removal will exceed regulatory thresholds (i.e., 260 linear feet, 160 square feet of surface area, or 35 cubic feet). For non-

scheduled in-house asbestos removal, annual notification is required at least 10 working days prior to the calendar year when the projected workload for the year indicates these thresholds will be exceeded. Consult with EPA or authorized State authority for annual notification requirements. State and local regulations may have additional licensing and notification requirements.

### **2.2.3 Public Works Engineering**

Asbestos is a primary consideration for any project (electrical, mechanical, plumbing, etc.) since there may be significant impacts on project design and cost. Coordinate scopes of work, job plans and designs that involve ACM with Maintenance Control, the APM, OSH Department, Environmental Department and the Contracts Office.

Architectural and Engineering (A/E) firms providing design services for renovation or demolition work are required to either directly perform or subcontract the asbestos related sampling and design portions of the project. Use the A/E Design Guide and scope of work in Appendix A to assure adequate testing for project design. Ensure plans and specifications are prepared by an EPA accredited asbestos project designer per 40 CFR 763, AHERA–MAP (see Section 2.1.1.2). At some Navy activities the APM has the required project designer accreditation, and may be able to assist in specification preparation for in-house design, or review of contractor prepared plans and specifications.

### **2.2.4 Contracts**

Use UFGS 13281N, “Engineering Control of Asbestos-containing Materials,” for all asbestos work performed by contractors. Current versions are available on the CCB web site at <http://www.ccb.org>.

Since UFGS 13281N is a performance specification, the “Description of Work” paragraph is critical. Significant problems can occur during construction due to poor design. Ensure that accredited project designers prepare plans and specifications. Include project specific considerations such as occupancy of adjacent areas, operational equipment, and non-movable objects. The activity APM should review contractor submittals, especially the asbestos hazard abatement plan, prior to authorizing asbestos removal.

For facility service contracts (FSC), edit UFGS 13281N and insert as contract Section “C.” Include the guide specification for larger design/build or multiple award construction contracts, as appropriate. Develop and implement procedures to evaluate credit card purchases, simplified acquisitions, and self-help projects that may disturb asbestos.

### **2.2.5 Estimating Project Costs**

Consider asbestos cost impacts prior to submission for major claimant approval and EFD/A’s review. Existing activity surveys contain baseline information on asbestos removal costs. Include escalation and allowances for additional materials not identified in the activity survey – project specific testing during the design phase will further characterize ACM removal requirements for developing detailed cost estimates. Include costs for complying with applicable

State and local regulations. Additional requirements may include third party monitoring, permit fees, and landfill tipping fees.

## **2.2.6 Types of Funding**

The type of funding used to address asbestos depends on its location, the type of project, and the hazard posed. As always, the project must meet the criteria specific to the type of funds.

Funding types include:

- Real Property Maintenance / Other Base Operations Support (RPM/OBOS)
- Hazard Abatement (HA)
- Military Construction, Navy (MCN)
- Shore Environmental Quality Operation and Maintenance (O&MN or O&MNR)
- Family Housing, Navy (FHN)

### **2.2.6.1 Real Property Maintenance or Other Base Operations Support (RPM/OBOS).**

Most actions required to comply with asbestos regulations are the result of asbestos removal or abatement as part of maintenance and repair, and are therefore funded by Real Property Maintenance or Other Base Operations Support (RPM/OBOS).

**2.2.6.2 Hazard Abatement (HA).** Naval Facilities Engineering Command centrally manages the Hazard Abatement (HA) funds for abatement of NAVOSH deficiencies. The HA Program focuses on the protection of workers from health and safety hazards, rather than correcting deteriorated facilities; that is, hazards assigned a Risk Assessment Code of “1” (RAC 1), as determined by the installation OSH Department in accordance with OPNAVINST 5100.23 Series. HA funds are limited to amounts greater than \$100,000 but typically less than \$1 million for deficiency corrections, and must be programmed at least 6 months prior to the fiscal year of the project. These funds are not available for conducting asbestos surveys or developing asbestos O&M plans. HA funds cannot to be used for asbestos removal that is required as part of a larger project. The OSH Department or the cognizant EFD/A may be able to provide coordination and technical support for HA projects.

**2.2.6.3 Military Construction, Navy (MCN).** In the case of construction, asbestos removal should be part of the construction project costs.

**2.2.6.4 Shore Environmental Quality Operation and Maintenance (O&MN or O&MNR).** In some instances, where State regulations have specific environmental requirements, asbestos related actions may be funded by the major claimant via the Environmental Program. Both EPA and State required asbestos *training* (i.e., designer, worker, inspector, and supervisor accredited training) may be eligible for environmental funding. Obtain funding data for federal and state training and licensing requirements from the Environmental Department.

**2.2.6.5 Family Housing, Navy (FHN).** Work on Navy family housing units has to be FHN funded, unless the Asbestos contamination is determined to be from a non-housing source

## ASBESTOS MANAGEMENT MATRIX

SUBJECT	REFERENCE	KEY PROVISIONS	ACTION
<b>O &amp; M Program</b>	OPNAVINST 5100.23, Ch. 17 <sup>(1)</sup> NFESC SP-2027-ENV <sup>(2)</sup> EPA “Green Book” <sup>(3)</sup> 40 CFR 763 <sup>(4)</sup>	Manage and record all asbestos-related actions Train personnel Work practices Activity responsible for implementation	<ul style="list-style-type: none"> <li>- Appoint Asbestos Program Manager</li> <li>- Test materials prior to disturbance or treat as ACM</li> <li>- Notify building occupants through training or by posting the building</li> <li>- Conduct periodic surveillance</li> </ul>
<b>Survey and Material Assessment (Inventory)</b>	OPNAVINST 5100.23, Ch. 17 NFESC TM-2325-ENV <sup>(5)</sup>	Locate, identify and assess condition of ACM and PACM Train personnel Develop as part of O&M program	<ul style="list-style-type: none"> <li>- Presume all suspect materials contain asbestos (unless testing proves otherwise)</li> <li>- Use certified Asbestos Building Inspectors</li> <li>- Determine degree of hazard for each suspect material</li> <li>- Site specific survey prior to renovation/demolition</li> </ul>
<b>In-house/PWC (repair and maintenance)</b>	29 CFR 1926.1101 <sup>(6)</sup> 29 CFR 1915.1001 <sup>(7)</sup> 40 CFR 61 <sup>(8)</sup> OPNAVINST 5100.23, Ch. 17 NIBS O&M Guidance Manual <sup>(9)</sup>	Exposure assessment Engineering controls/work practices Personal protective equipment (PPE) Medical surveillance Employee training Notification	<ul style="list-style-type: none"> <li>- Review work request for potential disturbance of ACM or PACM (review survey information)</li> <li>- Provide custodial and maintenance workers with EPA Level 2/OSHA Class III (16 hour) training</li> <li>- Develop SOPs or use NIBS O&amp;M manual</li> <li>- Notify EPA 10 days prior to start of year if annual estimated totals will exceed specified limits</li> </ul>
<b>Contracts: FSC, BOS, JOC, etc. (repair and maintenance)</b>	29 CFR 1926.1101 29 CFR 1915.1001 40 CFR 61 UFGS 1328 IN <sup>(10)</sup>	Exposure assessment Engineering controls/work practices PPE Trained workers Trained Project Designer to edit 13281N Notification	<ul style="list-style-type: none"> <li>- Inform contractors of location of ACM</li> <li>- Ensure contract provisions include: use of trained personnel; testing material prior to disturbance else manage as ACM; and notify building occupants prior to disturbance</li> <li>- Ensure contract review by APM</li> <li>- Notify EPA 10 days prior to start of year if annual estimated total s will exceed specified limits</li> </ul>
<b>Renovation/Demolition Design</b>	40 CFR 61 UFGS 13281N 29 CFR 1926.1101 29 CFR 1915.1001 40 CFR 763	Site specific survey prior to any renovation or demolition work EPA certified or accredited Project Designer required to edit 13281N	<ul style="list-style-type: none"> <li>- Review existing survey and material assessment (inventory)</li> <li>- Conduct destructive testing and collect additional samples (EPA certified Building Inspector)</li> <li>- Ensure review of site work and design by APM, environmental, safety, and industrial hygiene</li> </ul>
<b>Training (Awareness)</b>	29 CFR 1910.1001 <sup>(13)</sup> 29 CFR 1926.1101 29 CFR 1915.1001 OPNAVINST 5100.23, Ch 17	Hazard communication	<ul style="list-style-type: none"> <li>- Inform building occupants, custodial and maintenance workers of presence and location of ACM at work site.</li> <li>- Provide custodial and maintenance workers with EPA Level 1/OSHA Class IV (2 hour) training for work in buildings with ACM</li> </ul>

## ASBESTOS MANAGEMENT MATRIX

SUBJECT	REFERENCE	KEY PROVISIONS	ACTION
<b>Construction, Renovation, Demolition</b>	40 CFR 61 UFGS 13281N 29 CFR 1926.1101 29 CFR 1915.1001 NFESC TM-2210-ENV <sup>(11)</sup> NFESC TM-2211-ENV <sup>(12)</sup>	EPA Notification Trained workers PPE Exposure assessment Medical surveillance Engineering controls/work practices NESHAP trained on-site supervisor ROICC project oversight, with tech support provided by A/E, EFD/EFA and activity	<ul style="list-style-type: none"> <li>- Use design developed by certified Project Designer</li> <li>- Use specified forms (40 CFR 61) to notify EPA or State 10 days prior to starting work.</li> <li>- Use trained/certified EPA Level 3/OSHA Class I and II workers/supervisors</li> <li>- Establish restricted work areas</li> <li>- Adequately wet materials</li> <li>- Dispose in leak tight containers</li> </ul>
<b>Recordkeeping</b>	29 CFR 1910.1001 29 CFR 1926.1101 29 CFR 1915.1001 OPNAVINST 5100.23	Maintain records concerning presence, location and quantity of ACM Maintain exposure monitoring records Maintain training records	<ul style="list-style-type: none"> <li>- Keep building related records for the duration of ownership</li> <li>- For Navy personnel, keep monitoring records at least 50 years beyond last date of employment</li> <li>- For Navy personnel, keep training records one year beyond last day of employment</li> </ul>
<b>Waste Disposal</b>	40 CFR 61	Waste labeling, collection and disposal Waste Shipment Record (WSR)	<ul style="list-style-type: none"> <li>- Adequately wet waste</li> <li>- Dispose in leak tight containers</li> <li>- Coordinate WSR with Environmental</li> </ul>

1. OPNAVINST 5100.23F: Navy Occupational Safety and Health Program Manual, Chapter 17 Asbestos, 15 July 2002
2. NFESC SP-2027-ENV: Asbestos Control Program, Operations and Maintenance Plan, Sept 1997
3. EPA 20T-2003: Managing Asbestos In Place, A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials, July 1990
4. 40 CFR 763, Subpart E, Appendix C: Asbestos Model Accreditation Plan, 3 Feb 1994
5. NFESC TM-2325-ENV: Asbestos Inspection/Reinspection Decision Tree, Oct 1999
6. 29 CFR 1926.1101: Asbestos in Construction Industry, 29 June 1995
7. 29 CFR 1915.1001: Asbestos in Shipyard Industry, 29 June 1995.
8. 40 CFR 61, Subpart M: National Emission Standards for Hazardous Air Pollutants; Asbestos NESHAP, 20 Nov 1990
9. National Institute of Building Sciences: NIBS Guidance Manual, Asbestos Operations & Maintenance Work Practices, Second Edition, Dec 1996
10. UFGS 13281N: Unified Facilities Guide Specification, Engineering Control of Asbestos-containing Materials, Sept 2000
11. NFESC TM-2210-ENV, Managing Asbestos Abatement for Demolition Contracts, Sept 1996
12. NFESC TM-2211-ENV, Managing Asbestos Abatement for Renovation Contracts, Sept 1996
13. 29 CFR 1910.1001: Asbestos General Industry, 29 June 1995

## Facilities Asbestos Work Checklist

Item	Yes	No
1. Is ACM in the work area?		
2. Does the work request indicate that building materials are to be disturbed (drilled, sanded, removed, replaced, etc)?		
3. Does the Project Scope clearly identify the form, condition, quantity and location of asbestos materials to be disturbed/removed?		
4. Will the building be occupied during asbestos removal/disturbance?		
5. Has the OSH manager been notified if the building will be occupied?		
6. Have building occupants been notified prior to asbestos removal/disturbance?		
7. Do State or local regulations apply?		
<b>In-House Work</b>		
8. Have standard operating procedures or a compliance plan been developed?		
9. Did an accredited Project Designer develop the compliance plan?		
10. Has the APM reviewed the project plans and specifications?		
11. Has a Notification form been sent to EPA or State at least 10 days in advance?		
<b>Contracted Work</b>		
12. Was UFGS 13281N used to design the project?		
13. Is asbestos removal sequenced first to allow other trades to work freely?		
14. Has the APM, OSH office, and/or Environmental reviewed contractor submittals, including the safety and removal plans?		
15. Has a Notification form been sent to EPA or State at least 10 days in advance?		
16. Will the work be inspected for environmental and health/safety compliance?		

### Checklist Discussion

Item 1 - Refer to written records, building plans and specifications, and asbestos inspection/survey reports to determine if ACM is present in the work area. Obtain existing survey reports from the Asbestos Program Manager (APM). Existing data, where available, can reduce renovation/demolition asbestos survey costs by approximately 50-75%. Note, for renovation with demolition or total building demolition, destructive testing is required per 40 CFR 61 Subpart M, Asbestos NESHAP.

Item 2 - Review the work request to determine if building materials that contain (or are presumed to contain) asbestos will be or may be disturbed. Work specifically involving maintenance, repair, renovation, and demolition triggers requirements in the Asbestos NESHAP (40 CFR 61) and OSHA (29 CFR 1926.1101 and 1915.1001).

**Note:** If ACM is present, but not expected to be disturbed, note the presence on the work request and inform workers of the importance of not disturbing the ACM; proceed as a non-ACM project.

Item 3 - Because of the need for environmental and personnel exposure control, the Project Scope must include information on the amount, condition, and location of all asbestos materials. The accessibility, or degree of difficulty to remove the asbestos materials, should also be described in detail. Accessibility impediments may include: drop ceilings, obstruction by other objects, or scuttle ports through which personnel must enter (ex. cable work above suspended ceilings adjacent to insulated pipes). Failure to properly evaluate the scope of the project could cause extensive delays and cost overruns.

Item 4 - Determine if the building will be occupied during asbestos work. This affects the cost of asbestos removal (occupant protection and containment), and also invokes the requirement for notification of building occupants, per 29 CFR 1910.1001.

Item 5 - Notify the OSH manager in advance if the building will be occupied during asbestos removal. The OSH manager will ensure that proper procedures are implemented to protect building occupants from exposure.

Item 6 - When the building will be occupied during asbestos removal, all building occupants must be fully aware of the abatement action. The OSH manager, APM, or an industrial hygienist should conduct a seminar to properly inform personnel.

Item 7 - Ensure applicable State and local regulatory requirements are met. The air pollution control districts of many counties require a permit to remove asbestos. Additionally, many state and local governments require special licensing for contractors engaged in asbestos removal work. Legal counsel should provide a review and opinion on the applicability of these State and local regulations, per OPNAVINST 5100.23 Series, Chapter 17.

**Determine if the work will be done by in-house personnel or by contract. If in-house proceed to item 8; if by contract, proceed to item 12.**

### **In-House Work**

Item 8 - Develop written standard operating procedures or a compliance plan, as indicated in OPNAVINST 5100.23 Series, Chapter 17. Basic procedures used to minimize and/or contain asbestos fibers include wet methods, mini-enclosures, and HEPA vacuums.

For repair and maintenance, standardized work practices are provided in the National Institute of Building Sciences (NIBS), *Guidance Manual: Asbestos Operations and Maintenance Work Practices*. For larger projects, the *Asbestos Abatement Guideline Detail Sheets*, EP-1110-1-11, U.S. Army Corps of Engineers, contains a series of detailed drawing sheets with instructions that identify the proper containment and controls to be employed in support of individual abatement work tasks.

Item 9 - The AHERA MAP (40 CFR 763) and OPNAVINST 5100.23 Series, Ch. 17, require that an accredited Project Designer develop the compliance plans for renovation/demolition projects.

Item 10 - Provide adequate time for the APM to review project plans and specifications. Where the task is not covered by previously approved standard work practices, the APM should make sure that the appropriate protective measures are used for the job.

Item 11 - NESHAP (40 CFR 61) requires written notification to the State or local air quality management district 10 working days prior to starting work. This notification is required for all demolition projects and renovation activities that breakup, dislodge, or similarly disturb ACM in amounts greater than 160 square feet, 260 linear feet, or 35 cubic feet.

An annual written notification is also required for non-scheduled routine maintenance activities (repair and maintenance) whenever the total amount of asbestos removed is likely to exceed the renovation limits for a given year. Notification is required prior to the beginning of the year. Check with the Environmental Office or APM to see if this notification has been submitted.

### **Contracted Work**

Item 12 - Use UFGS 13281N for all contracted asbestos work per OPNAVINST 5100.23 Series, Chapter 17. EPA accredited Project Designer training is required to edit the specification section.

Item 13 - Specify that project schedule must require asbestos removal be performed first. Asbestos work in regulated areas requires: sealing off or shutting down of the HVAC system; shutting down of electrical power; allowing entry by only trained personnel with personal protective equipment and respirators; and informing personnel on multi-employer work sites of the nature of the work and measures taken to ensure they are not exposed to asbestos. Scheduling asbestos work first eliminates many of these considerations.

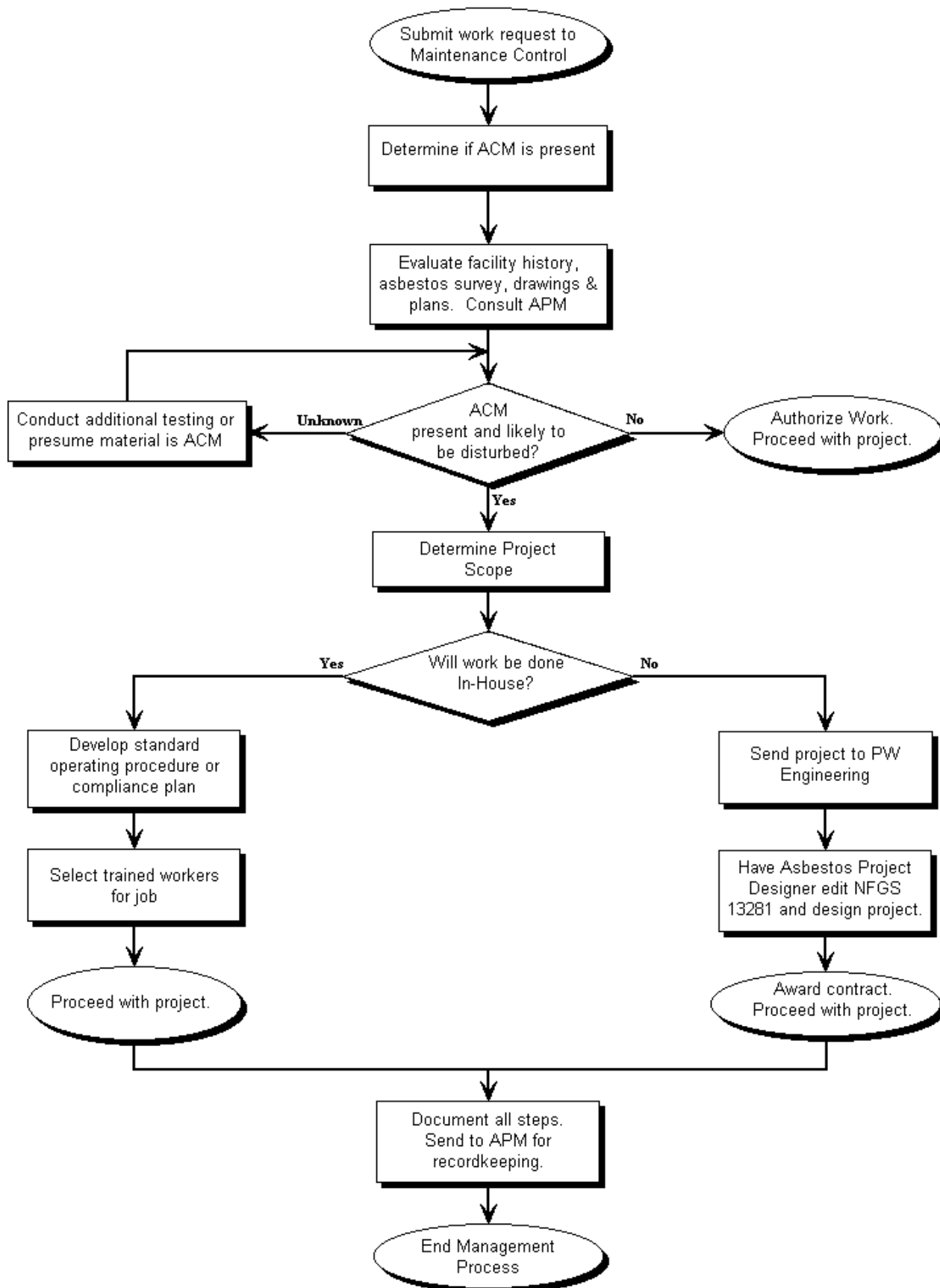
Item 14 - Submittals need technical review and approval to ensure EPA and OPNAVINST 5100.23 Series, Chapter 17 requirements are met. Since the removal, environmental, and health/safety plan submittals become an enforceable part of the contract specifications, conduct a thorough review prior to acceptance. The plans are usually prepared prior to the pre-construction meeting. Include the APM, OSH Office, and Environmental in pre-construction conferences to evaluate the contractor's environmental and health/safety plans.

Item 15 - NESHAP (40 CFR 61) requires written notification to the State or local air quality management district 10 working days prior to start of work. This notification is required for all demolition projects and renovation activities that would breakup, dislodge, or similarly disturb ACM in amounts greater than 160 square feet, 260 linear feet, or 35 cubic feet.

Item 16 - Ensure qualified personnel inspect and evaluate contractor environmental and health/safety performance. The APM, Environmental, OSH Office, or industrial hygienist may be able to provide technical support.



## FACILITIES ASBESTOS MANAGEMENT PROCESS



## 3.0 LEAD

Lead is most commonly associated with paints; however, plumbing materials, x-ray shielding, metal roof flashing, high voltage electrical system components, and other materials may also contain lead. Additionally, off-site contamination may be possible when facilities or housing areas are adjacent to roadways, down-wind from uncontained paint blasting and Navy shipyards. Lead may pose a hazard as either lead-based paint, lead in dust or lead in soil. Chronic exposures to low levels of lead may result in long-term health effects. Even brief exposures to high concentrations of lead may produce severe ill health effects. Acute exposures can occur from activities such as welding or burning on painted surfaces, dry sanding lead-containing paint, or indoor firing range maintenance. It takes very little lead to create a health hazard.

This section of the guide addresses federal regulations, Navy policy, and technical guidance for lead. Contact the activity OSH and Environmental Department, or the EFD/A Safety and Environmental Office point of contact in Appendix C for additional clarification and technical support of these requirements.

### 3.1 GENERAL REQUIREMENTS

#### 3.1.1 Federal Regulatory Requirements

OSHA, EPA, and the Department of Housing & Urban Development (HUD) all have regulations and guidance for paint that contains lead. The OSHA General Industry and Construction Standards for lead were promulgated to protect workers from harmful lead exposures, regardless of the source or where the work is performed. More recently, the EPA and HUD finalized regulations that specifically address hazards associated with lead-based paint in pre-1978 housing and child-occupied facilities. Because lead can permanently damage the nervous system, especially during the early developmental years, the EPA and HUD regulations focus on the protection of children and occupants in their homes. The regulations of these agencies are outlined below.

#### NOTE:

OSHA standards apply to any detectable concentration of lead in paint – even small concentrations of lead can result in unacceptable employee exposures. By convention, paint with any detectable concentration of lead is referred to as “paint with lead” in this guide. “Paint with lead” should not be confused with the EPA and HUD regulatory definition of “lead-based paint” at 0.5wt% or 1 mg/cm<sup>2</sup>, nor the Consumer Product Safety Commission definition of “lead containing paint” at 0.06wt%. OSHA cannot recognize these levels as safe, as certain work practices entail exposures above the action level even at extremely low concentrations of lead.

3.1.1.1 29 CFR 1926.62 Construction Industry Standard, Lead. The construction work covered by this standard includes any repair or renovation activities, or other activities that disturb in place lead-containing materials, paints, coatings or substrates. This does not include routine cleaning and repainting where there is insignificant damage, wear or corrosion of existing lead-containing materials or surfaces.

The standard does not specify a minimum lead concentration to indicate the presence of lead or the potential for occupational exposure; nor does it specify a minimum surface area. The standard applies if the presence of lead is detected using a valid detection method, such as ASTM Method D3335-85a “Standard Test Method for Low Concentrations of Lead, Cadmium, and Cobalt in Paint by Atomic Absorption Spectroscopy,” with an accepted detection limit of 0.01wt% (100ppm). When a detectable concentration of lead is present, the standard specifies the level of protection required for workers based upon the construction related work processes (i.e., task-based triggers) or previous exposure assessments.

3.1.1.2 29 CFR 1910.1025 General Industry Standard, Lead. Employees performing maintenance activities *not* associated with construction work, such as maintenance of a firing range, are covered by this general industry standard.

3.1.1.3 40 CFR 745, Subpart D –Lead-Based Paint Hazards. The EPA defines a lead-based paint hazard for target housing and child-occupied facilities as a paint-lead hazard, a dust-lead hazard, or a soil-lead hazard. A paint-lead hazard is *deteriorated* paint that contains greater than 0.5wt% lead (5,000 ppm), or lead-based paint on a friction surface subject to abrasion or a chewable surfaces with evidence of teeth marks. A dust-lead hazard has surface lead-contaminated dust in excess of the EPA levels, 40 micrograms per square foot ( $\mu\text{g}/\text{ft}^2$ ) for floors and 250  $\mu\text{g}/\text{ft}^2$  for interior window sills. A soil-lead hazard is bare soil play areas exceeding 400 ppm lead, or rest of the yard bare soil average exceeding 1200 ppm. EPA defines target housing and child-occupied facilities as follows:

“Target housing” means any housing constructed prior to 1978; except housing for the elderly or persons with disabilities (unless a child who is less than 6 years of age resides or is expected to reside in such housing), and any Zero-bedroom dwelling.

“Child-occupied facility” means a building, or portion of a building, constructed prior to 1978, visited regularly by the same child, 6 years of age or under, on at least two different days within any week (Sunday through Saturday period), provided that each day's visit lasts at least 3 hours and the combined weekly visit lasts at least 6 hours, and the combined annual visits last at least 60 hours. Child-occupied facilities may include, but are not limited to, day-care centers, preschools and kindergarten classrooms.

3.1.1.4 40 CFR 745, Subpart E –Residential Property Renovation, Information Distribution Requirements. Under Subpart E, the EPA requires persons who perform a renovation of target housing to provide a lead hazard information pamphlet to the owner and occupant no more than 60 days prior to starting work. This notification requirement also applies to repair and maintenance that disrupt more than two square feet of lead-based painted surface per component in occupied units and common areas of multi-family dwellings. Records demonstrating compliance with this subpart must be retained for 3 years following completion of the work. Records include signed and dated acknowledgments of receipt of notification, records of notification regarding work in common areas, or reports by a certified inspector that lead-based paint is not present. On-line unit specific Occupant notification package is available via ***EHS Manager***.

3.1.1.5 40 CFR 745, Subpart F – Occupant Disclosure. While this EPA regulation does not apply to Navy owned family housing it does apply to target homes transferred via PPV. However, based on the joint NAVFAC/BUMED policy letter of May 1997, the requirements of this subpart will followed as Navy policy. On-line unit specific Occupant Disclosure packages are available via **EHS Manager**.

3.1.1.6 40 CFR 745, Subpart L—Lead-based Paint Activities (training and work practices). This Subpart of the EPA regulations covers training, work practices, and certification requirements that pertain to target housing and child-occupied facilities. These provisions are intended to ensure that individuals conducting “lead-based paint activities” such as inspections, risk assessments, and hazard abatement, are properly trained and certified. Further, any lead-based paint activity must be performed in compliance with HUD and EPA guidance. The federal government waived sovereign immunity for certifications and fees associated with lead-based paint activities; therefore, this regulation applies to federal employees performing inspection, assessment, design and abatement of lead-based paint hazards. Federal agencies are also required to comply with State and local requirements.

**NOTE:**

The regulations in 40 CFR 745 Subpart L apply to the evaluation and abatement of lead-based paint hazards. Rarely does the Navy conduct an “abatement” as it is defined in the regulations –the occasions being title transfer of housing built before 1960, or if a child is identified with an elevated blood lead level related to Navy housing.

There are mandated federal regulations (not yet promulgated) that would extend the EPA training, certification and work practice requirements to public and commercial buildings. Many States have already done so.

Workers performing maintenance, repair, remodeling and renovation in target housing where lead-based paint may be disturbed need not be certified, unless the specific intent is to abate a hazard. However, OSHA requirements for worker protection still apply and work practices that are protective of the occupants should be followed.

3.1.1.6 40 CFR 260-268 Hazardous Waste Management. These EPA regulations require that all solid waste, including painted components and construction debris, be characterized to determine applicable handling, storage and disposal requirements. Though the regulations cited here are federal, nearly all States are authorized to administer their own hazardous and solid waste regulatory programs. Local regulations and specific landfill requirements can further restrict disposal options for lead-based paint coated materials.

It is strongly recommended that waste determinations be made, by either analytical means or knowledge of the waste, before the project begins. This may require analysis of a number of composite samples (i.e., paint layers plus substrate) to adequately characterize the waste as a whole. Components with multiple layers of paint on relatively little substrate, such as window frames and trim, may exhibit the toxic characteristic for lead and must be managed as hazardous waste. Analyses from similar structures or components may serve as knowledge of the waste. Consult the Environmental Department for site-specific requirements.

Note, the hazardous waste generated by a demolition or renovation project could be sufficient to change the installation generator status of a Small Quantity Generator of less than 1000 kg (2200 pounds) per month, to a Large Quantity Generator of more than 1000 kg per month, subject to 90 day waste accumulation time limits, additional hazardous waste training, more recordkeeping, and the contingency planning requirements of 40 CFR 262.34. A carefully planned “deconstruction” approach may be warranted to segregate hazardous components, minimizing the total volume of hazardous waste generated.

3.1.1.7 HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, June 1995 (Title X, Section 1017). These guidelines address lead hazards posed by deteriorated paint, dust, and soil in the residential environment. The guidelines provide detailed technical information on how to identify lead-based paint and related hazards in housing, and how to control such hazards safely and efficiently

3.1.1.8 24 CFR 35 Evaluation and Reduction of Lead-based Paint Hazards. On September 15, 1999, HUD issued a final rule on the requirements for evaluation, and reduction of lead-based paint hazards in federally owned residential property. The purpose of this rule is to ensure federally owned housing that is to be sold, does not pose lead-based paint hazards to young children. The provisions of 24 CFR 35 Subpart C are applicable to pre-1960 Navy-owned housing at title transfer, and require abatement of lead-based paint hazards before occupancy. There is an option, however, to transfer the abatement responsibility with the property. Title transfer of Navy housing constructed between 1960 and 1978 requires assessment and disclosure of known lead-based paint and lead-based paint hazards. Similar to the EPA work practice standards, this rule includes Prohibited Methods of Paint Removal in section 24 CFR 35.140.

### 3.1.2 Navy Policy and Guidance

3.1.2.1 OPNAVINST 5100.23 Series, NAVOSH Manual, Chapter 21, Lead. This instruction restricts the use of all paints to less than 0.06% lead by weight. Navy personnel are to assume painted surfaces contain lead, but are not hazardous if in good condition. Therefore, large scale testing and removal of paint is not warranted. **Painted surfaces should be managed in place and maintained in good condition.** The NAVOSH Manual also includes worker protection and ventilation system criteria to reduce exposures.

3.1.2.2 NAVFAC Message R 160647 Z APR 98 ZYB, Lead Dust Clearance Levels. To protect building occupants, a clearance level of 200 micrograms per square foot following construction work in public and commercial buildings that are not considered child-occupied is recommended (not recommended for industrial facilities).

3.1.2.3 Unified Facilities Guide Specification (UFGS) 13282N, Lead in Construction. This guide specification covers the requirements for protection of workers and disposal of lead, and provides guidelines and recommendations for cleanup where construction projects impact material containing lead and/or paint with lead. It does not apply to abatement of lead hazards in target housing or child-occupied facilities.

3.1.2.4 Unified Facilities Guide Specification (UFGS) 13283N, Removal/Control and Disposal of Paint with Lead. This guide specification covers the requirements and procedures for limiting occupational and environmental exposure to lead when removing/controlling paint

with lead or lead-based paint, including hazard abatement as defined by Public Law 102-550 Title X - Residential Lead-Based Paint Hazard Reduction Act of 1992. It is for the restoration of a surface and does not apply to welding and hot work.

3.1.2.5 COMNAVFACENGCOM ltr 11101, FAC 08T/1822B of 9 NOV 1992, Navy Family Housing Lead-Based Paint/Asbestos Inventory Program. In FY93, NAVFACENGCOM began worldwide asbestos and lead-based paint inspection of Navy family housing. The goals of the inventory were to locate asbestos-containing material and lead-based paint, determine its condition, assess potential health risks to occupants, and develop techniques to reduce the cost of managing and abating asbestos and lead-based paint in housing. As a result, each activity received individual community Lead-based Paint Management Plans and a Lead Activity Summary. Housing Departments maintain copies of these plans. Worldwide inspection results are maintained at Navy Public Works Center, Norfolk. Copies of these plans, and their associated impact on Navy Housing units, are available via the **EHS Manager**, which can be accessed from [www.myhsg.navfac.navy.mil](http://www.myhsg.navfac.navy.mil).

3.1.2.6 NAVFAC/BUMED policy letter, May 1997, LEAD-BASED PAINT ASSESSMENT PROGRAM DISCLOSURE FOR NAVY FAMILY HOUSING. This policy letter provided guidance for distribution of new occupant disclosure information and included: sample disclosure documents; press releases; and answers to frequently asked questions (FAQs).

3.1.2.7 Indoor Firing Ranges Industrial Hygiene Technical Guide, TM6290.99-10, Navy Environmental Health Center (NEHC), Rev. 1, May 2002. This guide provides NAVOSH technical guidance for the evaluation of potential lead hazards at indoor firing ranges. Significant lead hazards are present when cleaning or performing maintenance and repairs. Lead in dust tends to accumulate around the firing line, bullet trap, and exhaust ventilation equipment. Prior to any work, assess hazards in accordance with the guide. Use specialized maintenance and cleaning contracts or in-house work practices to perform scheduled and unscheduled repairs. In addition to this guidance, NAVFAC has established a Technical Center of Expertise for Small Arms Ranges at Atlantic Division, Naval Facilities Engineering Command, Code 15, commercial 757-322-4316.

3.1.2.8 Lead-Based Paint Hazards in DoN PPV Projects, NAVFACHQ Special Ventures Acquisition, October 2002. This memo provide guidance to execution teams implementing DoN PPV projects.

## 3.2 LEAD MANAGEMENT IN FACILITIES

Paint with lead and material containing lead, and lead-based paint requirements are specific as to how they apply, depending on where the work is performed (i.e., industrial/non-industrial facilities vs. target housing/child-occupied facilities). Therefore, the following sections are subdivided into facilities and housing related discussions. Note that OSHA regulations apply to the *protection of workers* when performing work in both facilities and housing where paint with lead is present. Additional EPA regulations apply for the *protection of occupants* when lead-based paint is identified in target housing or child-occupied facilities.

### 3.2.1 Maintenance Control

3.2.1.1 Facilities. Evaluate work requests and determine if lead-containing paint or materials will be disturbed. The scope of work in Appendix A contains the criteria for determining the presence of lead. Collect paint chip samples from surfaces that will be disturbed by renovation, maintenance, repair, or demolition work. Apply OSHA standards where lead-containing paint is identified. If no samples are collected, assume painted surfaces contain lead.

An X-Ray Fluorescence (XRF) meter may be used as a “screening” device to rapidly determine the presence of lead; however, an XRF is designed to identify lead-based paint at the levels defined by HUD and EPA, and is not sensitive enough to satisfy OSHA standards for determining that *no* lead is present. Therefore, a negative result for lead-based paint from an XRF must still be considered lead containing per OSHA standards, unless laboratory analysis using a valid detection method is conducted.

Characterize the expected waste stream(s) to determine applicability of hazardous waste management and disposal regulations prior to starting work. The scope of work in Appendix A may be used for hazardous waste determinations. Verify waste disposal requirements with the Environmental Department, as hazardous waste versus non-hazardous waste disposal may significantly impact project costs. (see Section 3.1.1.6)

In non-housing, non-child occupied facilities, use the NAVFAC recommended dust clearance level of 200 micrograms per square foot if appropriate to ensure adequate clean up following any work that disturbs lead (not recommended for industrial facilities).

3.2.1.2 Target Housing. For work requests in housing areas, the individual community *Lead-based Paint Management Plan*, along with the *Lead Activity Summary*, may be used as a baseline to determine whether lead-based paint will be disturbed. These management plans were the result of Navy family housing inspections conducted between 1993 and 1996 (see Section 3.1.2.5). Housing Departments maintain copies of the plans; inspection results are included in the appendix and are available online via CNI-Housing’s *EHS Manager*.

Occupant notification per EPA regulation is required for maintenance and remodel/renovation in target housing where lead-based paint (0.5wt%) is identified. Coordinate notification and recordkeeping requirements for confirmation of receipt with the Housing Manager. If the project is to “abate” a lead-based paint hazard, then EPA worker training, certification, work practices, and clearance standards also apply.

#### **NOTE:**

Regardless of whether the EPA clearance standards apply, that is, whether the project is to “abate” a hazard, appropriate precautions must be considered for protecting occupants and leaving the housing clean after any work that disturbs paint with lead.

As for facilities, OSHA standards apply to workers in housing when lead-containing paint is identified. If no samples are collected, assume painted surfaces contain lead. Coordinate waste disposal requirements with the Environmental Department prior to beginning work.

### **3.2.2 In-house Work**

3.2.2.1 Facilities. Where work disturbs painted surfaces, assume lead is present unless testing has been performed. Critical concerns for in-house public works personnel are:

- welding, torching, and burning where paint is present
- soldering or sanding painted surfaces
- housekeeping/clearance following work that disturbs lead

Contact the installation's medical treatment facility industrial hygiene department to determine the need for worker exposure monitoring and/or work practice evaluation. Apply OSHA requirements commensurate with the task when lead or lead-containing paint is identified.

Use other specialized equipment such as HEPA filtered power tools, portable welding exhaust systems, and paint removal equipment when work disturbs lead. Do not dry sweep construction debris where lead is present, use a HEPA filtered vacuum instead. Ensure building occupants are protected from lead hazards during work in occupied buildings.

3.2.2.2 Target Housing. In addition to OSHA requirements for workers, ensure occupants are provided with written notification in advance of maintenance and repair work that disturbs more than 2 square feet of lead-based paint in accordance with 40 CFR 745, Subpart E. Follow lead safe work practices such as HUD Guidelines when performing residential work.

### **3.2.3 Public Works Engineering**

3.2.3.1 Facilities. Coordinate designs and scopes of work that involve disturbing painted surfaces and other materials containing lead with Maintenance Control, OSH Department, Environmental Department and the Contracts Office. Use the scope of work in Appendix A to obtain adequate data for project design and hazardous waste determinations. Edit UFGS 13282N for removal of painted components and materials containing lead, and 13283N for removing lead containing paint from surfaces.

3.2.3.1 Target Housing. For maintenance, repair, remodel or renovation work that disturbs lead-based paint, a certified project designer is highly recommended for preparation of plans and specifications. If the project is a lead-based paint hazard abatement, ensure personnel have EPA or State project designer certification to collect samples, and to prepare or review plans and specifications. Again, ensure occupants are provided with written notification in advance of maintenance and repair work that disturbs more than 2 square feet of lead-based paint in accordance with 40 CFR 745, Subpart E. Follow lead safe work practices such as HUD Guidelines when performing residential work.

### **3.2.4 Contracts**

3.2.4.1 Facilities. Use UFGS 13282N, "Lead in Construction," or 13283N, "Removal/Control and Disposal of Paint with Lead," for all contracted work that disturbs lead during construction, maintenance, repair and demolition. UFGS 13282N focuses on removal or demolition of components that may be painted with or contain lead, such as x-ray shielding, or intact painted doors and architectural components. UFGS 13283N addresses requirements for



limiting occupational and environmental exposure to lead while removing lead-containing or lead-based paint from surfaces such as water towers, historic wooden trim, or metal railings. It is also intended for lead-based paint hazard abatement in target housing and child-occupied facilities. Current versions are available on the Construction Criteria Base web site: <http://www.ccb.org>.

UFGSs 13282N and 13283N are performance specifications; therefore, the description of work paragraph is critical to identifying the quantity of material(s) to be removed. For FSC formats, use the UFGS as section “C.” Include the guide specification for design/build or multiple award construction contracts, as appropriate.

**3.2.4.2 Target Housing.** EPA requires advanced notification to housing occupants before performing work that disturbs more than two square feet of a lead-based paint, per 40 CFR 745 Subpart E. Note that projects involving housing maintenance, repair, or revitalization are not considered “abatement” even if the work removes or reduces potential lead exposure to occupants. The federal training and certification requirements of 40 CFR 745 Subpart L do not apply for this type *non-abatement* work; however, State regulations may be more stringent and require licensing and training.

If performing a lead-based paint hazard abatement, follow EPA’s specific training requirements and work practices. Ensure project personnel have EPA or State project designer certification to collect samples, and to prepare/review plans and specifications. Ensure workers are EPA or State licensed. The HUD Guidelines are also applicable. Lead hazard abatement should not be conducted in occupied units.

### **3.2.5 Estimating Project Costs**

Include the cost of applicable OSHA and EPA work practices, management, and disposal requirements for lead-containing/lead-based paint and materials as part of the project costs for renovation or demolition. Include escalation and allowances for additional materials in project cost estimates. Additional testing will be performed during the design phase to develop detailed cost estimates and determine compliance requirements for worker protection and waste disposal.

### **3.2.6 Types of Funding**

The type of funding used to address lead-based paint depends on its location, the type of project, and the hazard posed. As always, the project must meet the criteria specific to the type of funds. Funding types for lead-containing/lead-based paint work may include:

- Real Property Maintenance / Other Base Operations Support (RPM/OBOS)
- Hazard Abatement (HA)
- Military Construction, Navy (MCN)
- Shore Environmental Quality Operation and Maintenance (O&MN or O&MNR)
- Family Housing, Navy, (FHN)

**3.2.6.1 Real Property Maintenance or Other Base Operations Support (RPM/OBOS).** For facilities, RPM/OBOS funds are typically used to perform maintenance, repair and small scale demolition projects, which may involve lead-containing/lead-based paint. All aspects of

the project, such as sampling/identification of paint and worker protection, should be addressed using project funds.

3.2.6.2 Hazard Abatement (HA). Naval Facilities Engineering Command centrally manages the Hazard Abatement (HA) funds for abatement of NAVOSH deficiencies. The HA Program focuses on the protection of personnel from health and safety hazards, rather than correcting deteriorated facilities. Installing or upgrading a paint spray booth where employees are being overexposed to lead is an example of a valid project. Removal of deteriorated paint does not qualify for HA funding, and these funds are not available for lead-based paint removal or disturbance that is required as part of a larger project.

HA funds are limited to amounts greater than \$100,000 but typically less than \$1 million for deficiency corrections, and must be programmed at least 6 months prior to the fiscal year of the project. Engineering Field Divisions/Activities (EFD/A's) points of contact in Appendix C may be able to provide technical coordination and support for HA projects.

3.2.6.3 Military Construction, Navy (MCN). In the case of construction, lead-containing/lead-based paint management, including removal if necessary, is part of the construction project costs.

3.2.6.4 Shore Environmental Quality Operation and Maintenance (O&MN or O&MNR). In some instances where State regulations have specific environmental requirements, lead-based paint related actions may be funded by the major claimant via the Environmental Program. *Training and accreditation* of federal employees performing inspections, assessment, design and abatement of lead-based hazards in target housing and child-occupied facilities may be eligible for environmental funding. Coordinate funding for federal and state training and licensing requirements with the Environmental Department.

3.2.6.5 Family Housing, Navy (FHN). Work on Navy family housing units has to be FHN funded, unless the Lead contamination is determined to be from a non-housing source.

# LEAD HAZARD MANAGEMENT MATRIX

FACILITIES MANAGEMENT			
SUBJECT	REFERENCES	KEY PROVISIONS	ACTION
<b>In-house/PWC</b>	29 CFR 1926.62 <sup>(1)</sup> OPNAVINST 5100.23 Ch. 21 <sup>(2)</sup> 40 CFR 260-270	Exposure assessments (task-based triggers) Engineering controls Personal protective equipment Medical surveillance Employee training	<ul style="list-style-type: none"> <li>- Coordinate project with Environmental and Safety</li> <li>- Test project impacted surfaces before disturbance</li> <li>- Use &gt;0.01% by weight or 100 ppm as detection limit</li> <li>- Train workers who disturb materials containing lead</li> <li>- Implement engineering controls, work practices and PPE.</li> <li>- See Waste Disposal</li> </ul>
<b>Contracts (FSC, BOS/JOC, etc.)</b>	29 CFR 1926.62, 29 CFR 1910.1025 UFGS 13282 <sup>(3)</sup> UFGS 13283 <sup>(4)</sup> 40 CFR 260-270	Exposure assessments (task-based triggers) Engineering controls Personal protective equipment Medical surveillance Employee training	<ul style="list-style-type: none"> <li>- Coordinate review with Environmental and Safety</li> <li>- Use 13282 for removal of materials containing lead</li> <li>- Use 13283 for removal of lead paint or hazard abatement</li> <li>- See Waste Disposal</li> </ul>
<b>Design</b>	29 CFR 1926.62 UFGS 13282 & 13283 40 CFR 261	Exposure assessments (task-based triggers) Engineering controls Personal protective equipment Medical surveillance Employee training Waste characterization per 40 CFR 261 (Toxicity Characterization Leachate Procedure—TCLP)	<ul style="list-style-type: none"> <li>- Coordinate review with environmental and safety</li> <li>- Use 13282 for removal of materials containing lead</li> <li>- Use 13283 for removal of lead paint or hazard abatement</li> <li>- Ensure review of site work reports and design by environmental, safety, industrial hygiene.</li> <li>- Determine costs, handling, storage and disposal based on site work waste characterization.</li> </ul>
<b>Construction/ Demolition</b>	29 CFR 1926.62 UFGS 13282 & 13283 NFESC TM-2285-ENV <sup>(5)</sup> 40 CFR 260-270	Exposure assessments (task-based triggers) Engineering controls Personal protective equipment Medical surveillance Employee training Waste characterization per 40 CFR 261 (Toxicity Characterization Leachate Procedure—TCLP) ROICC project oversight, with tech support provided by A/E, EFD/A and activity	<ul style="list-style-type: none"> <li>- Test project impacted surfaces before disturbance</li> <li>- Use &gt;0.01% by weight or 100 ppm as detection limit</li> <li>- Train workers who disturb materials containing lead</li> <li>- Implement engineering controls, work practices and PPE.</li> <li>- Ensure review of site work reports and design by environmental, safety, industrial hygiene.</li> <li>- Determine costs, handling, storage and disposal based on site work waste characterization.</li> <li>- See Waste Disposal</li> </ul>
<b>Training</b> <ul style="list-style-type: none"> <li>• workers,</li> <li>• bldg occupants,</li> <li>• HW handling</li> </ul>	29 CFR 1926.62 29 CFR 1910.1025 40 CFR 262.34	Train employees exposed at or above the action level Communicate hazards per 29 CFR 1926.59	<ul style="list-style-type: none"> <li>- Ensure training includes the topics outlined in the regulation</li> </ul>
<b>Paint with Lead, OSHA considerations</b>	29 CFR 1926.62 29 CFR 1910.1025 OPNAVINST 5100.23 Ch. 21	Identify using valid detection method prior to disturbance (0.01% by wt or 100 ppm)	<ul style="list-style-type: none"> <li>- Test project impacted surfaces before disturbance</li> <li>- Use &gt;0.01% by weight or 100 ppm as detection limit</li> <li>- Train workers who disturb materials containing lead</li> <li>- Implement engineering, work practices and PPE.</li> <li>- Ensure review of site work reports and design by safety, industrial hygiene, environmental.</li> <li>- Determine costs, handling, storage and disposal based on site work waste characterization.</li> </ul>

## LEAD HAZARD MANAGEMENT MATRIX

SUBJECT		REFERENCES	KEY PROVISIONS	ACTION
FACILITIES MANAGEMENT(cont.)	Lead in dust (clearance)	NAVFAC Msg R 160647Z <sup>(11)</sup>	Clear areas to 200 µg/sqft Applies to construction activities in non-housing/non-child occupied/non-industrial facilities	<ul style="list-style-type: none"> <li>- Competent person determines the location and number of samples to take</li> <li>- Complete pre-work sampling to eliminate any pre-existing conditions from the final result</li> </ul>
	Lead in dust, non-lead work areas (i.e., lunch rooms)	OSHA CPL 2-2.58 <sup>(12)</sup>	Use 200 µg/sqft as acceptable level in non-industrial facilities	<ul style="list-style-type: none"> <li>- Conduct wipe and air samples of hygiene facilities where cleanliness is in question</li> </ul>
	Firing Ranges	29 CFR 1910.1025 <sup>(6)</sup> OPNAVINST 5100.23 Ch. 21 NEHC TM-6290 99-10 <sup>(7)</sup> MIL-HDBK-1027/3B <sup>(8)</sup>	Exposure assessment Housekeeping/cleaning Industrial ventilation requirements.	<ul style="list-style-type: none"> <li>- Maintain ventilation system</li> <li>- Conduct scheduled maintenance using specialized procedures/personnel</li> </ul>
	BRAC Property Transfer	DoD BRAC Policy <sup>(9)</sup> 41 CFR 101-47 <sup>(10)</sup>	Environmental Baseline Survey for transfer	<ul style="list-style-type: none"> <li>- Eliminate “health hazards” prior to property transfer per the Federal property management regulations</li> <li>- Notify and Negotiate w/ transferee.</li> </ul>
	Paint Lead Hazard	40 CFR 745 Sbpt D & L (or Q) NAVFAC ltr 11101 FAC 08T /1822B of 9 Nov 92 <sup>(18)</sup>	Hazards include: deteriorated interior/exterior paint, friction surfaces with dust hazard, and chewable surface with teeth marks.	<ul style="list-style-type: none"> <li>- Use In-Place Management to control hazards (NAVFAC ltr)</li> <li>- Eliminate potential hazards with Improvement or major repair projects</li> <li>- Abate known Hazards</li> </ul>
HOUSING/RESIDENTIAL CHILD OCCUPIED FACILITIES*	Dust Lead Hazard	40 CFR 745 Sbpt D	Defines hazard and clearance levels (≥40 µg/ft² on floors or ≥ 250 µg/ft² on interior window sills). Impacts housing transfers and for housing with a child with EBL	<ul style="list-style-type: none"> <li>- Use In-Place Management to control hazards (NAVFAC ltr)</li> <li>- Eliminate potential hazards with Improvement or major repair projects</li> <li>- Abate known Hazards</li> </ul>
	Soil Lead Hazard	40 CFR 745 Sbpt D DoD BRAC Policy	Impacts housing transfers and Child w/EBL. Sets hazard and clearance levels for active and BRAC sites (≥ 400 ppm bare soil in play areas and ≥ 1200 ppm bare soil rest of yard). CERCLA does NOT apply unless contamination is due to Navy IR site.	<ul style="list-style-type: none"> <li>- Use In-Place Management to control hazards (NAVFAC ltr)</li> <li>- Eliminate potential hazards with Improvement or major repair projects</li> <li>- Abate known Hazards</li> </ul>
	Disclosure	40 CFR 745 <sup>(14)</sup> Sbpt F NAVFAC/BUMED ltr May 97 <sup>(15)</sup>	Disclosure to all occupants using EPA pamphlet	<ul style="list-style-type: none"> <li>- Follow EPA Subpart F, per Navy policy --Housing Office to provide at time of assignment</li> </ul>
	Residential Property Transfer	24 CFR 35 Sbpt A,B, C, & R <sup>(16)</sup> DoD BRAC Policy DoD LBP Field Guide <sup>(17)</sup>	Inspect, risk assessment, & abate hazards based on construction date Property conveyance must be within 12 months of final risk assessment	<ul style="list-style-type: none"> <li>- No action required when conveyed housing to be demolished or units are transferred unoccupied and new owner abates hazards prior to re-occupying the unit</li> <li>- Timing of Risk Assessment shall be coordinated with CNI-Housing and project execution team to ensure timely delivery of final assessment</li> </ul>

# LEAD HAZARD MANAGEMENT MATRIX

SUBJECT		REFERENCES	KEY PROVISIONS	ACTION
HOUSING/RESIDENTIAL CHILD OCCUPIED FACILITIES (cont.)	Design, Construction, Renovation, Remodel	29 CFR 1926.62 40 CFR 745 Sbpt D & L (or Q) UFGS 13282 & 13283 40 CFR 745 Sbpt E 40 CFR 261	Train workers Work practices Notification of occupants Year constructed affects actions	<ul style="list-style-type: none"> <li>- PWC or contractor provides Lead Hazard pamphlet before work</li> <li>- Test project impacted surfaces before disturbance</li> <li>- Use &gt;0.01% by weight or 100 ppm as detection limit</li> <li>- Train workers who disturb materials containing lead</li> <li>- Implement engineering, work practices and PPE.</li> <li>- Ensure review of site work reports and design by environmental, safety, industrial hygiene.</li> <li>- Determine costs, handling, storage and disposal based on site work waste characterization.</li> <li>- See Waste Disposal</li> </ul>
	LBP Hazard Abatement	29 CFR 1926.62 40 CFR 745 Sbpt D, E, L (or Q) UFGS 13282	Worker Protection Defines LBP hazards (Paint, Dust, & Soil) Clearance requirements Work practices for abatement of hazards Specific training Occupant notification Required for child with elevated blood lead (EBL) or DOD Housing title transfer.	<ul style="list-style-type: none"> <li>- Training &amp; certification required for all work practices</li> <li>- Test project impacted surfaces before disturbance</li> <li>- Use &gt;0.01% by weight or 100 ppm as detection limit</li> <li>- Train workers who disturb materials containing lead</li> <li>- Implement engineering, work practices and PPE.</li> <li>- Coordinate review with environmental and safety</li> <li>- Use 13283 for removal of lead paint</li> <li>- Ensure review of site work reports and design by environmental, safety, industrial hygiene.</li> <li>- Determine costs, handling, storage and disposal based on site work waste characterization.</li> <li>- See Waste Disposal</li> </ul>
	Clearance (after LBP hazard abatement)	40 CFR 745 Sbpt D & L	Dust and soil sampling must be conducted. Clearance determinations are made in accordance with the work practice standards.	<ul style="list-style-type: none"> <li>- Required after a LBP hazard abatement.</li> </ul>
	Training & Certification	40 CFR 745 Sbpt L (or Q)	Applies to conducting LBP activities on Residential/Child Occupied facilities.	<ul style="list-style-type: none"> <li>- Required only for inspections, risk assessments and LBP Hazard Abatement.</li> <li>- EPA training &amp; certification is not required for remodel/renovation in Housing</li> </ul>
	Navy Family Housing Inspection Program	NAVFAC Itr 11101 FAC 08T /1822B of 9 Nov 92 40 CFR 745 Sbpt L (or Q)	Locate LBP/Asbestos in family housing and determine its condition Assess LBP/Asbestos health risks Inspected by EPA/State certified inspectors	<ul style="list-style-type: none"> <li>- Housing Inventory complete and management plans submitted</li> <li>- Follow-up by local PWC, Housing manager, and medical treatment facility (MTF)</li> </ul>
Child Elevated Blood Lead		BUMED 6200.14A <sup>(19)</sup>	Coordinate w/BUMED, activity team of housing, PREVMEID, IH, facilities.	<ul style="list-style-type: none"> <li>- Obtain additional support EFD/A, PWC, NEHC to identify sources and conduct abatement if necessary.</li> </ul>

## LEAD HAZARD MANAGEMENT MATRIX

SUBJECT	REFERENCES	KEY PROVISIONS	ACTION
<b>Waste Disposal</b>	40 CFR 260-270 <sup>(13)</sup>	Waste characterization of demo debris required. Hazardous Waste subject to specific storage, manifest, transportation, and disposal requirements. HW handlers must have documented training. Intact paint and waste from housing may be subject to relaxed disposal requirements	- Verify disposal requirements with Environmental Department; have Environmental review waste storage and disposal plans. - Provide hazardous waste manifest records to installation Envir Dept (i.e., Generator of Record).

\*Note: See *EHS* Manager for unit specific impact of these regulations

The lead hazard management matrix summarizes the issues, regulations, references, key provisions and actions. Additional requirements are in the references:

### References

1. 29 CFR 1926.62: **Lead in Construction** – Federal Register (FR) 3 May 93
2. OPNAVINST 5100.23F, Chapter 21: **Navy Occupational Safety and Health Program Manual**, 15 July 2002.
3. UFGS 13282N: **Lead in Construction** –Mar 2002
4. UFGS 13283N: **Removal/Control and Disposal of Paint with Lead** –Mar 2002
5. NFESC TM-2285-ENV, **Lead Paint Removal QA Manual for Renovation/Demolition Contracts at Non-Housing/Non-Child Occupied Facilities**, Aug 98
6. 29 CFR 1910.1025: **Lead General Industry**
7. NEHC TM-6290.99-10: **Indoor Firing Ranges Industrial Hygiene Technical Guide** – Rev. 1, May 2002
8. MIL-HDBK-1027/3B: **Range Facilities and Miscellaneous Training Facilities Other Than Buildings** -- Notice 1, 30 Jun 95
9. DoD BRAC Policy: **Asbestos, Lead Paint, and Radon Policies at BRAC Properties** -- Office of the Under Secretary of Defense letter of 31 Oct 94
10. 41 CFR 101-47: **Utilization and Disposal of Real Property**, revised 01 July 00
11. NAVFAC Msg R 160647Z: **Lead Dust Clearance Levels**, April 1998
12. OSHA Std Compliance Directive: CPL 2-2.58: **Inspection Compliance Procedures**, 13 Dec 93
13. 40 CFR 260 through 270: Hazard Waste Regulations on Management, Identification, Generation, Transportation, Disposal, and Permitting.
14. 24 CFR 35: **Lead Based Paint Poisoning Prevention in Certain Residential Structures**, FR 15 Sep 99
  - Subpart A -- Disclosure of Known Lead-Based Paint Hazards Upon Sale or Lease of Residential Property
  - Subpart B -- General Lead-Based Paint Requirements and Definitions for All Programs
  - Subpart C -- Disposition of Residential Property Owned by a Federal Agency Other Than HUD
  - Subpart R -- Methods and Standards for Lead-Based Paint Hazard Evaluation and Hazard Reduction Activities
15. NAVFAC/BUMED joint letter, **Lead-Based Paint Assessment Program Disclosure Program for Navy Family Housing**, 29 May 97.
16. 40 CFR 745, **Lead-Based Paint Poisoning Prevention in Certain Residential Structures**, FR 01 June 98
  - Subpart D, Lead-Based Paint Hazards, FR 05 Jan 01
  - Subpart E, Hazard Education Before Renovation of Target Housing FR 01 June 98.
  - Subpart F, Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards Upon Sale or Lease of Residential Property, FR 29Feb 96
  - Subpart L, Lead-Based Paint Activities, FR 29 Aug 96. Amendment - Date Extension for Training to Mar 2000, FR 6 Aug 99
  - Subpart Q, State and Indian Tribal Programs
17. **Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property - A Field Guide**, DUSD(ES) and EPA, Dec 99. [Note: does NOT apply to PPV project conveyance]

18. COMNAVFAECENGCOM ltr 1101 FAC 08T/1822B, **Navy Family Housing Lead Based Paint/Asbestos Inventory Program**, 9 Nov 1992

19. BUMEDINST 6200.14A, **Pediatric Lead Poison Prevention Program (PLPP)** 9 Jul 2003

## Facilities Lead Work Checklist

Item	Yes	No
1. Is lead-based paint, paint with lead or material containing lead present in the work area?		
2. Does the work request indicate that lead paint or materials will be disturbed (drilled, sanded, etc.) or involve maintenance, repair, renovation or demolition?		
3. Does the Project Scope clearly identify the quantity and location of lead-based / lead-containing paint or material to be disturbed/removed?		
4. Do state or local regulations apply?		
5. Has a hazardous waste characterization been done to determine disposal requirements?		
<b>In-House Work</b>		
6. Have standard operating procedures or a compliance plan been developed?		
7. Has the lead removal been sequenced first to allow other trades to work freely?		
8. Will the building be occupied during lead removal/disturbance?		
9. For work in occupied housing units, have occupants been notified prior to removal/disturbance of lead-based paint?		
<b>Contracted Work</b>		
10. Was Unified Facilities Guide Specification Section 13282N or 13283N used to design the project?		
11. Have pre-construction environmental and health & safety submittals been reviewed by Envir & OSH departments prior to acceptance?		
12. Has the lead removal been sequenced first to allow other trades to work freely?		
13. Will the building be occupied during lead removal/disturbance?		
14. For work in occupied housing units, have occupants been notified prior to removal/disturbance of lead-based paint?		
15. Will the work be inspected for environmental and health/safety compliance?		

### Checklist Discussion

**Item 1** - Identification of lead-based paint, paint with lead or material containing lead is essential in developing the project scope and ensuring workers are not over exposed. Paint with lead is commonly found in older buildings, fuel piping, and steel structures, and on every type of surface that can be painted or coated. The OSHA standard applies when lead is detected using a valid detection method (detection limit of valid method is usually 0.01wt%).

**Note:** This level of 0.01wt% is less than the Consumer Product Safety Commission (CPSC) 0.06wt% definition of lead-containing paint; therefore, lead should be expected in any paint, regardless of age.

Refer to written records, building plans and specifications, and any lead-based paint inspection/survey reports. For Housing projects, contact the Housing Department or access CNI-Housing's **EHS Manager** for a copy of the *Lead-based Paint Management Plan*. Conduct additional sampling where limited data exists. Use the scope of work in Appendix A for lead-paint sampling.

Item 2 - Review the work request to determine the type of work and if building materials will be disturbed. Work specifically involving maintenance, repair, renovation, and demolition triggers requirements in OSHA (29 CFR 1910.1025 or 29 CFR 1926.62).

Item 3 - Because of the need for environmental and personnel exposure control, the Project Scope needs to include information on the amounts, the condition, and locations of all lead-containing materials and the degree of removal difficulty. The accessibility of the materials should be described in detail. Accessibility impediments may include drop ceilings or other obstructions. Failure to properly evaluate the scope of the project could cause extensive delays and cost overruns.

Item 4 - Ensure applicable State or Local regulatory requirements are met. State regulations may apply for certain types of residential work or exterior building repainting. If the project is to abate a hazard due to elevated blood lead in a child, EPA and state or local regulations will apply. Presently, lead-based paint hazard abatement in target housing requires EPA accredited training, at a minimum.

Item 5 - Prior to the start of work, characterize the expected waste stream and perform a preliminary toxic characteristic leachate procedure (TCLP) test for lead on non recyclable or otherwise solid/hazardous waste to determine requirements for handling, storage, and disposal. Additional waste characterization may be necessary during the course of work in accordance with 40 CFR 261. If work is contracted, it is the responsibility of the contractor to make this determination.

Determine whether the work will be done by in-house personnel or by contract. If in-house personnel will perform the work, proceed to checklist item 6; if contracted go to item 10.

### **In-House Work**

Item 6 - Develop written standard operating procedures (SOP) or compliance plans, as indicated in OPNAVINST 5100.23 Series, Chapter 21. Basic procedures used to minimize and/or contain lead include wet methods, mini-enclosures, and HEPA vacuums.

For repair and maintenance, standardized work practices are provided in the National Institute of Building Sciences (NIBS) guide *Lead-Based Paint: Operations & Maintenance Work Practices Manual for Homes and Buildings*. The OSH or Environmental department may also have developed appropriate lead work practices.

Item 7 - Specify that project schedule must require lead removal work be performed first. This will permit other trades to work without specialized training or personal protective equipment and respirators. Where asbestos is also to be removed, perform lead work first.



Item 8 - Determine if the building will be occupied during lead work. This affects the cost of the lead removal (occupant protection and containment). Notify the OSH manager in advance if the building will be occupied during lead removal.

Item 9 - Notify housing occupants, per 40 CFR 745, Subpart E, in advance of work.

### **Contracted Work**

Item 10 - Use UFGS 13282N for projects that impact materials containing lead (building components, x-ray shielding, etc) or painted component; and UFGS 13283N to remove paint from surfaces (water tower, gusset plates prior to welding, etc).

**Note:** For projects involving housing, it is strongly recommended that a certified project designer (per 40 CFR 745) prepare the specification. Certification as a project designer is mandatory for projects to *abate* lead-based paint hazards in housing.

Item 11 - All contractor submittals need technical review and approval to ensure EPA requirements are met. Since the environmental and health/safety plan submittals become an enforceable part of the contract, conduct a thorough review prior to acceptance. The plans are usually prepared prior to the pre-construction meeting; include the OSH and Environmental Office in pre-construction conferences to evaluate the contractor's environmental and health/safety plans.

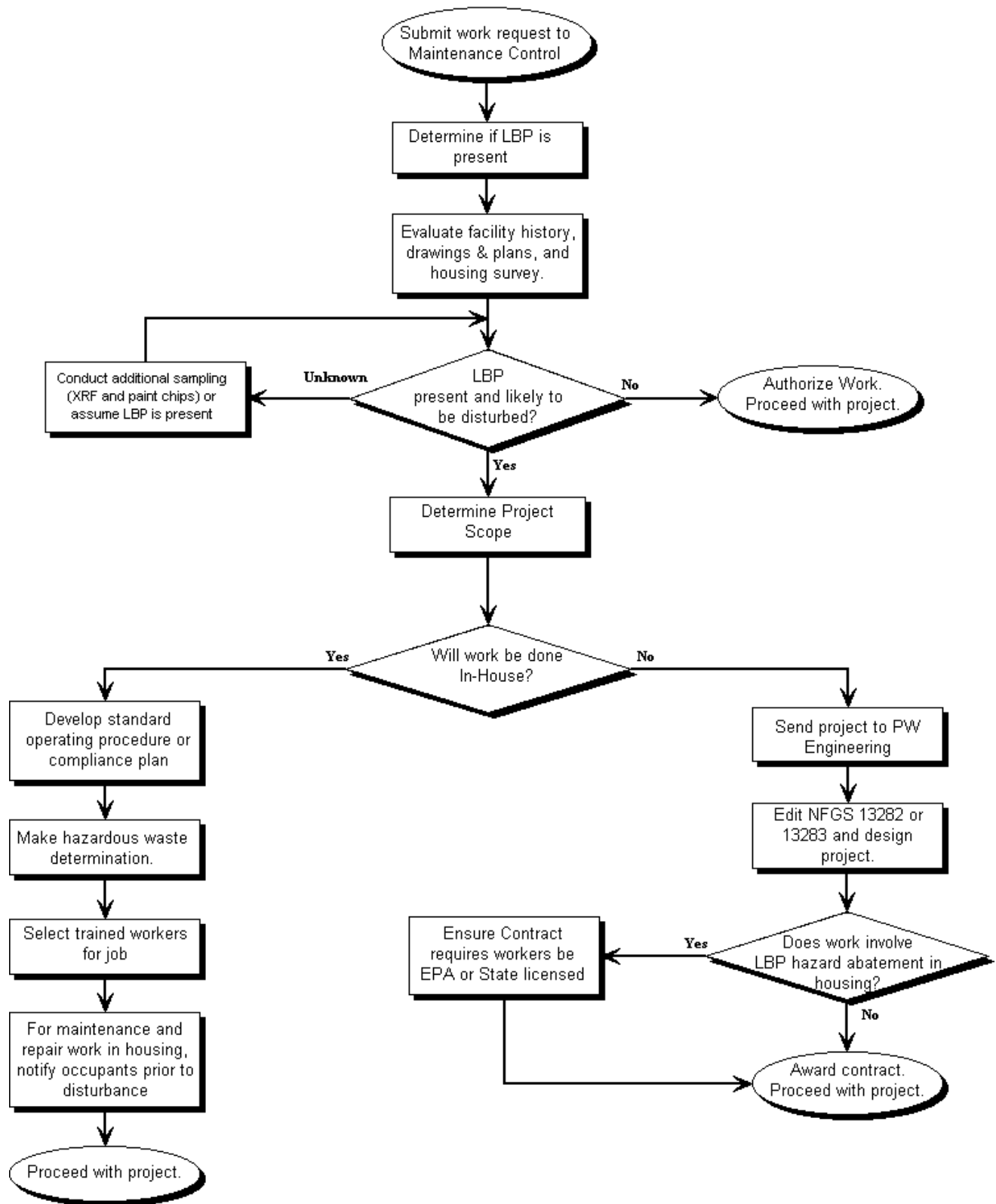
Item 12 - Specify that project schedule must require lead removal work be performed first. This will permit other trades to work without specialized training or personal protective equipment and respirators.

Item 13 - Determine if the building will be occupied during lead work. This affects the cost of the lead removal (occupant protection and containment). Notify the OSH manager in advance if the building will be occupied during lead removal.

Item 14 - Notify housing occupants, per 40 CFR 745 Subpart E, in advance of work.

Item 15 - Ensure qualified personnel inspect and evaluate contractor environmental and health/safety performance. The Environmental Office, OSH Office or Industrial Hygienist may be able to provide technical support during the design phase. OSH and Industrial Hygiene personnel act only in an advisory capacity per OPNAVINST 5100.23 Series requirements. Additional guidance on reviewing submittals and conducting oversight of contractor work is contained in NFESC TM-2285-ENV *Lead Paint Removal Quality Assurance Manual for Renovation/Demolition Contracts at Non-Housing/Non-Child Occupied Facilities*. A copy of the document can be obtained at <http://enviro.nfesc.navy.mil/esc425/LdPub.htm>.

## FACILITIES LEAD-BASED PAINT MANAGEMENT PROCESS





**APPENDIX A**

**A/E DESIGN GUIDES**  
**for**  
**ASBESTOS and LEAD**

# **ASBESTOS DESIGN GUIDE FOR A/E'S**

## **1. Introduction**

This Asbestos Design Guide defines the environmental services and submittal requirements for architects and engineers (A&E) performing asbestos design services for NAVFAC. A scope of work will be provided with the design Appendix A for the project. Ensure coordination of project specific information when subcontracted environmental or industrial hygiene services are used. Provide subcontractors with a project description and copy of this guide to ensure that appropriate testing is performed to support the project.

### **1.1 Communications**

Direct communication with the NAVFAC environmental reviewer is encouraged. If you have a question concerning a particular comment, contact your NAVFAC reviewer. This may avoid unnecessary re-submittal of plans and specifications due to a misunderstood comment. The project Design Manager is the central point of contact and the environmental reviewer's name, phone number, or email address may appear on comment sheets. Ensure the Design Manager is updated on follow up comments and responses that may impact the project.

### **1.2 Background**

Asbestos-containing materials (ACM) are commonly found in older building materials and related products. Federal regulations require a facility asbestos survey prior to any renovation, alteration, and repair or demolition project that will disturb building materials. Comply with all safety and environmental regulations during sample collection and field investigations. Take precautions to protect human health and the environment as required by federal, state and local regulations. Data from previous asbestos surveys may be available at the activity. Earlier surveys may not have included all suspect ACM that will be impacted by the project. Use available data to help determine the scope for the project. Obtain previous data from the activity asbestos program manager (APM) or designated representative.

## **2. Asbestos Design Requirements**

### **2.1 Asbestos**

Identifying all the asbestos-containing materials that will be disturbed during a demolition/renovation is critical. The designer must determine all activities that will be required during the construction phase. The asbestos survey and construction documents must identify all areas where asbestos will be disturbed and the protocol for the contractor to protect workers and the environment during all construction activities. The designer, preparing the specification and drawings, must have current accreditation as an Asbestos Project Designer by EPA or more stringent State or Local asbestos regulatory requirements.

### 3. Pre-Design Services

#### 3.1 Field Investigation (Site Work)

##### 3.1.1 Asbestos Testing

Survey and sample collection shall be project specific and applicable to all suspect materials, including those previously sampled or identified. Perform a thorough, project specific survey and evaluation during the site investigation phase. This may include roofing materials, crawl space soils, and confined utility chases. Identify ACM, for renovation projects, as required by the OSHA asbestos construction standard (such as, separation of joint compound from wallboard). For renovation projects that include demolition or demolition specific projects, ensure that destructive testing is performed and identification of ACM includes EPA requirements (such as, analyzing joint compound and wallboard as a composite). Notify the Activity Asbestos Program Manager (APM) or designated representative prior to conducting site work.

Ensure that personnel who perform ACM sampling are currently EPA-accredited or State/Locally licensed (as required), building inspectors. Provide copies of accreditation and applicable licenses with the Asbestos Report.

Laboratories performing analysis for asbestos in bulk materials shall be accredited by the National Institute of Standards and Technology/National Voluntary Laboratory Accreditation Program (NIST/NVLAP), American Industrial Hygiene Association, and shall be a successful participant and maintain proficiency in the NIST/NVLAP sponsored quality assurance program for asbestos identification. Provide copies of laboratory certification and state/local accreditation certificates with the Asbestos Report. Include copies of all certificates of analyses or test reports with the Asbestos Report.

### 4. Design Services

#### 4.1 Environmental Basis of Design

The Environmental Section of the Basis of Design shall address all issues that will affect the demolition/renovation/construction project. This section shall include subheadings for all environmental areas that might apply, i.e. Asbestos, Lead Containing Paint/Materials, PCBs, Mercury-containing lamps, Contaminated Soil and Groundwater, or Tank Removal.

**Asbestos:** Indicate the presence or absence of asbestos. If present and will be disturbed, provide a description and rationale for removal. If non-friable materials are present, in good condition and will not be disturbed by the project, indicate the location, quantity and description of these materials and provide rationale for in-place management versus removal (i.e., leaving floor tile and mastic in-place and covering with carpet). Research State or Local regulations to determine if an independent (Third party) monitoring firm must be retained by the Navy and identify asbestos removal final clearance requirements. Indicate disposal requirements and appropriate regulatory requirements.

## 5. Environmental Report

An Environmental Report shall be attached to the basis of design and include the following information (as required by the scope of work.)

### 5.1 Asbestos Section which:

- a) Provides a narrative summary of the site work that identifies the project description, location, previous survey data, additional asbestos identified. List the areas, types, and location of ACM and any contamination that will impact the project.
- b) Identifies conditions that affect access or egress for workers and equipment, such as, confined spaces, crawl spaces or elevated working surfaces. Identifies utility systems (HVAC, steam, electrical, etc) which may require shutdown during the project. Note: Where the building is to remain partially occupied by the Government during construction, specifically identify these utility shutdowns to the project manager, in writing.
- c) Summarizes state or local laws that affect asbestos removal and disposal for the project, such as project size, limitations on removal methods and air monitoring requirements. Also Include notification requirements, permit fees, licensing, independent Third party monitoring, or other specialized requirements.
- d) Includes copies of all accreditation certificates, licenses, certificates, sampling plans, and analyses and test reports identified above.

#### 5.1.2 “Other” Testing Section which:

- a) Describes the tests performed including site history and analytical methods. Results of testing to characterize soils.
- b) Summarizes state or local laws that affect removal of soil, and disposal requirements for the project. State limitations on removal methods and monitoring requirements. Includes notification requirements, permit fees, licensing or other specialized requirements.

### 5.2 Environmental Calculations

Provide calculations as part of the Environmental Report. Calculations for environmental work include:

- a) Relative volume calculations for total waste stream categorization when providing representative amounts of building components for disposal.
- b) Quantities of contaminated soil when unit pricing must be used (typical for all work with contaminated soil when the *exact* quantities are unknown.) When contaminated soil exists at the site, the designer must provide an initial estimate of the anticipated quantity of these items. The calculations shall include all assumptions made in determining the final estimated quantities.

## **6. Drawings, Specifications and Construction Estimate**

### **6.1 Environmental Drawings and Specifications**

All environmental drawings will be labeled as specified. These drawings will be placed before the Civil Drawings in a drawing set. These drawings will indicate all “environmental” type work that must be done on the project. These construction activities include:

Asbestos Removal Activities

Asbestos Removal Drawings and Specifications

Contaminated Soil (May be shown on the Civil Demolition sheets with extent of contamination delineated and appropriate notes.)

#### **6.1.1 Asbestos Drawings and Specification**

Provide scaled and dimensioned drawings and floor plans or building sections showing all ACM. (NOTE: Quantification by use of a schedule indicating ft<sup>2</sup> or ft<sup>3</sup> on the drawings or in the specifications is not a substitute for scaled and dimensioned drawings. Scaled and dimensioned drawings are the only acceptable means to quantify asbestos by showing the location and full extent of work.) All existing asbestos determined from the field survey must be indicated on the drawings by a chart or some other method to display the laboratory results of the asbestos analysis. If asbestos is present and will not be disturbed by the project, provide a drawing note indicating the type and location of the ACM, with a note that the material is not to be disturbed by project work. For ACM impacted by the project, indicate location, condition, and form of all ACM to be removed as well as structures, utilities and equipment that hinder access or egress. Provide dimensions for access or egress to crawl spaces, attics, chases or restrictive areas that affect asbestos removal personnel or equipment. Identify rooms by name and number. If ceiling tiles or panels are ACM, provide reflected ceiling plans showing grid size and layout. Indicate all diffusers, registers/grilles, light fixtures, and other ceiling mounted equipment and specify new ceiling system. Indicate all valves, gauges or other equipment associated with boiler or piping systems insulated with ACM and all dimensions or changes in duct or pipe elevations. Indicate approximate size and description of equipment and tanks. Identify utility services, such as steam, water or HVAC that will require system shutdowns during construction. Address the provision of temporary utility service where required.

Determine all air sampling requirements and whether independent (Third party) monitoring is required. The Third party monitor is identified as the Navy Consultant (NC) and the contractor hired person as the Private Qualified Person (PQP). Edit Specification Section 13281, “Removal and Disposal of Asbestos-Containing Materials.” An accredited EPA (or State/Locally Licensed) Asbestos Project Designer must prepare asbestos drawings and the specification.

#### **6.1.2 Minimal Disturbance of Asbestos**

Provide a drawing for projects where there will be a minimal disturbance of ACM during construction. Projects involving minimal disturbance of asbestos (i.e., fastening, drilling or anchoring into intact floor tile) require drawing notes only. The drawing note shall require



the contractor to provide specific information regarding asbestos control measures that include worker protection, building occupant protection and environmental protection. All existing ACM determined from the field survey must be indicated on the drawings by a chart or some other method to display the laboratory results of the asbestos analysis. Where a minimal disturbance of asbestos will occur, include Specification Section 01525 "Safety Requirements". The drawing note will also reference this Specification Section. Therefore, Specification section 13281 would not apply.

### **6.1.3 Contaminated Soil**

Provide separate Environmental drawings or use civil drawings that indicate the extent of known or suspected soil contamination. Indicate the type and level of contamination and refer to the appropriate specification for instructions on how to handle the contamination.

## **6.2 Construction Estimate**

Include specific data in the construction cost estimate for labor, equipment, and material, insurance, overhead and profit, permit fees, air monitoring, and disposal costs. Cost estimates should include all specialized equipment and materials the contractor may need to perform asbestos removal, such as scaffolding, lifts, or self-contained HEPA vacuum systems. Provide as a separate item, an estimate for independent Third party monitoring as required by State or Local regulations.

## **7. Design Submittals**

### **7.1 35% Design Development Submittal**

- **Basis of Design-Environmental Contents**  
Provide information as discussed in Sections 2 through 4 above
- **Environmental Report and Calculations**  
Provide the report and calculations as discussed in Section 5 above
- **Drawings, Specifications, and Cost Estimate**  
Drawings shall indicate preliminary location of any environmental areas of concern. At least one Environmental drawing shall be started to show the layout of the work. Provide an index of technical specification sections that will be developed. Provide the construction cost estimate identifying specific cost items.

### **7.2 100% Prefinal Submittal**

- **Revised Environmental Report and Calculations**  
A revised environmental report shall be prepared based on comments from the 35% submittal, if applicable. Final calculations for all environmental work shall be submitted
- **Drawings, Specifications, and Cost Estimate**  
Drawings shall indicate locations of all ACM. All existing ACM determined from the field survey must be indicated on the drawings by a chart or some other method to

display the laboratory results of the asbestos analysis. Edit the appropriate Specification Section and provide cross-reference to the drawing. Provide a revised construction cost estimate as necessary, based on project changes and comments.

### **7.3 Final Submittal**

- **Final Environmental Report and Calculations**

The final environmental report and calculations shall be included with the project specifications.

- **Drawings, Specifications, and Cost Estimate**

The final Environmental drawings must be stamped by a registered architect or engineer. An accredited Asbestos Project Designer appropriately licensed in the State where the work is to be accomplished must sign the appropriate drawings. Provide responses and corrections to prior comments. Provide final construction cost estimate.

## **8. Specialized Requirements**

### **8.1 State and Local Regulations**

State or Local regulations regarding asbestos may require specific licensing, testing, notification, work practice and engineering controls, Third party monitoring, clearance inspection and sampling, or specialized disposal. The designer must research the applicable provisions of these requirements as they relate to the project.

### **8.2 Overseas Final Governing Standards (FGS)**

The Final Governing Standards may provide supplemental information on the standards to be used for Navy designs at activities in an overseas location. The A&E shall comply with all requirements of the FGS for the country/host nation where the Activity is located. An EPA accredited (or State/Local) Asbestos Project Designer must prepare all asbestos drawings and specifications. If the country has no designer certification requirements then the certification must be from the United States. If the country has designer certification requirements then the asbestos designer must possess that certification and provide their name on the drawings and specification.

## **9. Post Construction Award Services (PCAS)**

Independent technical construction support, full or part-time Third party monitoring, or clearance testing services may be requested through PCAS. These services generally include providing trained and licensed personnel to perform consultation, inspection, air monitoring and independent clearance or other testing during construction. Personnel providing these services shall comply with State/Local regulations and maintain applicable licenses or registrations. A separate scope of work will be provided for Third party monitoring, where required.

# **Lead Design Guide for A/E's**

## **1. Introduction**

This Lead Design Guide defines the environmental services and submittal requirements for architects and engineers (A&E) performing lead design services for NAVFAC. A scope of work will be provided with the design Appendix A for the project. Ensure coordination of project specific information when subcontracted environmental or industrial hygiene services are used. Provide subcontractors with a project description and copy of this guide to ensure that appropriate testing and design services are performed to support the project.

### **1.1 Communications**

Direct communication with the NAVFAC environmental reviewer is encouraged. If you have a question concerning a particular comment, contact your NAVFAC reviewer. This may avoid unnecessary re-submittal of plans and specifications due to a misunderstood comment. The project Design Manager is the central point of contact and the environmental reviewer's name, phone number, or email address may appear on comment sheets. Ensure the Design Manager is updated on follow up comments and responses that may impact the project.

### **1.2 Background**

Lead has historically been identified as a poison. Lead was used extensively in household paints until 1978. Currently, the Consumer Product Safety Commission (CPSC) requires all paint to contain less than 0.06% lead. Lead was also used extensively as solder for plumbing pipes until 1986. Lead is also encountered in specialty situations such as medical (x-ray) protection, firing ranges, or roof flashing. All of these factors represent facility concerns for lead during demolition and renovation.

Paint with lead is the primary factor to consider during demolition and renovation. The Occupational Safety and Health Administration (OSHA) regulates worker exposures during construction work. OSHA did not specify a concentration of lead in paint, but considers any level of lead as determined by a valid test method as triggering the requirements. For construction purposes, the Navy uses 0.01% as the detection limit. The Environmental Protection Agency (EPA) and Housing and Urban Development (HUD) define Lead Based Paint (LBP) as 0.5% by weight for residential hazard evaluation purposes.

## **2. Lead Design Requirements**

### **2.1 Paint with Lead**

Identifying all the lead issues associated with a demolition/renovation project is critical. The designer must, at the earliest stage, determine all activities that will be required during the construction of the project. The sampling plan and construction documents must clearly identify all the areas of paint with lead and the protocol for the contractor to provide protection of workers and the environment during all construction activities. NAVFAC

recommends a dust clearance level of 200 micrograms per square foot for demolition/renovation projects in commercial buildings where re-occupancy will occur. Housing demolition/renovation projects are not classified as lead-based paint abatement. There are two situations that require abatement, which are: (1) hazard elimination due to a lead poisoned child or (2) the residential property is being transferred.

Paint with lead is commonly found in older buildings, fuel piping, and steel structures and on every type of surface that can be painted or coated. OSHA defines paint as containing lead for construction projects if any levels are present as determined by a valid test method. The Navy uses 0.01% as the detection limit. **Note: This level is less than the CPSC current definition of lead-containing paint; therefore, lead should be expected in any paint, regardless of age.** When demolishing materials that have paint with lead there are potential hazards associated with the generation of lead dust. There are four different scenarios when making a determination with regard to lead hazards associated with a project. Each scenario must address three aspects: worker protection, protection of surrounding areas, and disposal requirements.

- **Scenario No. 1:** Demolition of an entire building. In this case, the designer must make provisions for worker protection during the demolition activities and the disposal of the demolition debris will be handled as non-hazardous waste.
- **Scenario No. 2:** Interior or Exterior Renovation of portions of an existing building where painted materials are to be removed or renovated (i.e. windows, doors, walls, molding, ceilings, pipes, etc.) In this case, the designer must make provisions for worker protection, ensure renovation activities won't expose personnel in surrounding areas to lead levels above the Action Level of  $30 \mu\text{g}/\text{m}^3$  (This is an OSHA 8 hour time weighted average (TWA) measurement) and determine, during the design phase, the characterization of the wastestream for disposal purposes. The wastestream characterization will determine whether the waste is disposed of as hazardous or non-hazardous waste.
- **Scenario No. 3:** Removal of paint with lead from a substrate. In this case the designer must make provisions for worker protection and disposal of the paint waste as hazardous waste.
- **Scenario No. 4:** Installation of new work that would require minor demolition of surfaces that have paint with lead. Examples of this type of work include cutting holes in walls to install new electrical wires or mechanical piping; nailing of new items to existing surfaces; cutting out portions of painted piping; and welding to existing steel structures that have paint with lead. In this case the designer must either; 1) provide for worker protection, or 2) ensure activities won't expose personnel in surrounding areas to lead levels above the Action Level of  $30 \mu\text{g}/\text{m}^3$ , and provide for disposal of any residue that might be collected from dust filters or vacuum filters. (Note provisions for minimal disturbance of paint with lead in paragraph 6.1.3).

## 2.2 Materials Containing Lead

The demolition of materials containing lead will be the same as **Scenario No. 2** above. Lead containing materials would include items such as plumbing fixtures, flashing, and medical (x-ray) protection.

### **3. Pre-Design Services**

#### **3.1 Field Investigation (Site Work)**

##### **3.1.1 Lead Paint Testing**

Evaluate all painted surfaces that will be impacted by the project for lead. Areas to survey include all painted structures and surfaces, coatings on steel structures and fuel lines. If an X-ray Fluorescence (XRF) instrument is used for screening the results can only be used as a positive screen (i.e., to determine that lead is present at significant levels). Classify the XRF results as positive, inconclusive or negative according to the EPA Performance Characteristics Sheet for the instrument. Negative classified XRF results require paint chip sampling and analysis. Inconclusive XRF results are to be treated as positive for the presence of lead. Collect and analyze 5% of the inconclusive XRF readings to verify the presence of lead. Paint is identified as containing lead for construction projects if any levels are present as determined by a valid detection limit (use 0.01% as the detection limit). Collect samples as necessary to identify potential lead hazards for the project. Use applicable current ASTM, EPA or HUD guidelines for paint, soil and wipe sample criteria.

##### **3.1.2 Soil Testing**

Where the construction site is potentially located on contaminated soil, the design contract may require sampling. The designer shall complete the testing required by the Scope of Work and provide the required results to the Project Manager. The designer will then provide the appropriate design information in the construction documents. For lead, the EPA has designated requirements for residential real properties or child-occupied facilities. Testing will most likely be performed on these types of facilities.

##### **3.1.3 Waste Characterization Study**

Determination of lead painted building components and materials, as hazardous or solid waste for disposal, shall be performed in conjunction with site work. Components that will be demolished and disposed of as part of the project shall be sampled using the Toxicity Characteristic Leaching Procedure (TCLP) for lead in accordance with the provisions of 40 CFR 261, Subpart C.

In order to determine if the lead concentration of the building demolition waste is within regulatory limits for disposal as a non-hazardous material, a representative sample of the waste stream must be analyzed for lead using the TCLP Method. It is sometimes necessary to look at demolition debris as a heterogeneous waste stream comprised of different items, objects, components and materials that are dissimilar in composition. Destructive testing of components is required. Testing includes, but is not limited to collecting subsamples of baseboards, window systems, doors and walls. Collect adequate amounts of subsample materials to provide the requested number of composite samples. The representative composite sample should be prepared from samples of each of the different building material categories, and then mixed in proportion to the percentage by

weight of the different components in the anticipated waste stream. Patch and repair occupied areas with suitable materials (joint compound or caulking).

Lead is defined as a hazardous waste when the TCLP extract contains a lead concentration above the Toxicity Characteristic (TC) threshold of 5 parts per million (ppm) or milligrams per liter (mg/L). Leachable lead analysis differs from total lead analysis, as determined by XRF or chip analysis, in that leachable lead is dependent on the type of lead compound present and the size of the particle (i.e. solubility.) Some lead compounds are more leachable/soluble than others. Since the total lead analysis does not determine the specific lead compound present, it is difficult to predict how much of the lead will be leachable.

The EPA has recently determined that residential LBP waste can be managed as household waste. Residential LBP waste is any contractor waste derived from lead abatement, remodeling, or rehabilitation on residential dwellings like single family homes, apartment buildings, row houses, military barracks, or college dormitories. For projects involving these types of facilities, the waste must be indicated as residential and can only be disposed in a municipal solid waste landfill. Determine if State or local governments have more stringent regulations that apply.

### **3.1.4 Wipe (Dust) Sampling**

Wipe (Dust) samples for lead may be necessary to identify potential lead hazards prior to the project for occupational health considerations or as a baseline for determining if an increase in contamination occurred after completion of the project. In some projects, it may be desirable to collect and analyze baseline wipe samples in accordance with methods defined by Federal, State, and local standards inside and outside of the expected work boundary to assess the degree of dust contamination in the facility prior to lead disturbance or removal.

Clearance dust sampling is recommended to ensure that adequate clean up is conducted for work in public and commercial buildings and required after hazard abatement. Follow Federal, State or local requirements for surface dust sampling to determine clearance in lead-based paint hazard abatement work.

## **4. Design Services**

### **4.1 Environmental Basis of Design**

The Environmental Section of the Basis of Design shall address all other issues that will affect the demolition/renovation/construction project. This section shall include subheadings for all environmental areas that might apply, i.e. Asbestos, Lead in Paint or Materials, PCBs, Mercury-containing lamps, Contaminated Soil and Groundwater, or Tank Removal.

**Paint with Lead / Materials containing Lead:** Describe all the different scenarios that will be encountered in the project (i.e. “tasks” per OSHA.) Describe how the drawings

will provide all the information required for the contractor. Indicate disposal requirements and any special waste segregation that must be done.

**Contaminated Soil:** Indicate the existence or absence of contaminated soil and source of information. List all reports that contain existing analytical information on the existing site conditions. Describe methodology to protect the construction workers and the environment.

## **5. Environmental Report**

An Environmental Report shall be attached to the basis of design and include the following information (as required by the scope of work.)

### **5.1 Lead Section** which:

- a) Provides a narrative summary of the site work that identifies the project description, location, previous survey data, additional paint with lead identified, and a description and full characterization of all wastestreams (i.e. hazardous – providing all waste codes, or non-hazardous.) List the areas, types, and location of paint with lead and any contamination that will impact the project.
- b) Identifies conditions that affect access or egress for workers and equipment, such as, confined spaces, crawl spaces or elevated working surfaces. Identifies utility systems (HVAC, steam, electrical, etc) which may require shutdown during the project. Note: Where the building is to remain partially occupied by the Government during construction, specifically identify these utility shutdowns to the project manager, in writing.
- c) Summarizes state or local laws that affect materials containing lead removal and disposal for the project, such as project size, limitations on removal methods and air monitoring requirements. Includes notification requirements, permit fees, licensing or other specialized requirements.
- d) Includes copies of all accreditation certificates, licenses, certificates, sampling plans, and analyses and test reports identified above.

### **5.1.2 “Other” Testing Section** which:

- a) Describes the tests performed including site history and analytical methods. Results of testing to characterize soils.
- b) Summarizes state or local laws that affect removal of soil, and disposal requirements for the project. State limitations on removal methods and monitoring requirements. Includes notification requirements, permit fees, licensing or other specialized requirements.

## 5.2 Environmental Calculations

Provide calculations as part of the Environmental Report. Calculations for environmental work include:

- a) Relative volume calculations for total wastestream categorization when providing representative amounts of building components for TCLP testing (a total volume of demolition debris shall be calculated and a breakdown of each debris component shall be shown.)
- b) Quantities of contaminated soil when unit pricing must be used (typical for all work with contaminated soil and groundwater when the *exact* quantities are unknown.) When contaminated soil or groundwater exist at the site, the designer must provide an initial estimate of the anticipated quantity of these items. The calculations shall include all assumptions made in determining the final estimated quantities.

## 6. Drawings, Specifications and Construction Estimate

### 6.1 Environmental Drawings and Specifications

All environmental drawings will be labeled as specified. These drawings will be placed before the Civil Drawings in a drawing set. These drawings will indicate all “environmental” type work that must be done on the project. These construction activities include:

Lead Demolition Activities

Lead Paint Removal Drawings and Specifications

Minimal Disturbance of Paint with Lead

Contaminated Soil (May be shown on the Civil Demolition sheets with extent of contamination delineated and appropriate notes.)

#### 6.1.1 Lead Demolition Drawings and Specification

Lead demolition is defined as demolishing and removing any items/building components that are painted with lead. The lead demolition information can be shown directly on the demolition drawings by adding notes indicating that specific items are covered by paint with lead and that demolition activities must be conducted in accordance with Specification Section 13282N, “Lead in Construction.” Edit the specification for the appropriate wipe sample clearance criteria. All existing lead levels determined from the field survey must be indicated on the drawings by a chart or some other method to display the laboratory results of the lead analysis. Where lead hazards are required to be abated in housing or child-occupied facilities per EPA or HUD regulations, use Specification Section 13283N, “Removal/Control and Disposal of Paint with Lead”. A certified Lead Project Designer must prepare lead removal drawings and specifications for lead hazard abatement projects.



### **6.1.2 Lead Paint Removal Drawings and Specification**

Provide scaled and dimensioned drawings and floor plans or building sections showing all locations and items where paint with lead must be removed. Examples of this include wood molding or steel structures to be salvaged and reused in the finished project, but are coated with lead paint. Indicate all structures, utilities and equipment that hinder access or egress. Provide dimensions for access or egress to crawl spaces or attics or restrictive areas that affect lead removal personnel or equipment. Conduct removal activities in accordance with Specification Section 13283N, "Removal/Control and Disposal of Paint with Lead". Indicate all identified lead levels as a chart or table in the specification and on drawings. Edit the specification for the appropriate wipe sample clearance criteria. A certified Lead Project Designer must prepare lead abatement drawings and specifications where lead hazards are required to be abated in housing or child-occupied facilities per EPA or HUD regulations.

### **6.1.3 Minimal Disturbance of Paint with Lead**

Provide a drawing for projects where there will be minimal disturbance of paint with lead or materials containing lead during construction. Projects involving minimal disturbance of lead (i.e., installation of suspended ceiling when drilling or anchoring into intact painted surfaces, or disturbance of less than 2 square feet of painted surface) require drawing notes only. Wipe sample clearance is not required for minimal disturbance of lead. All existing lead levels determined from the field survey must be indicated on the drawings by a chart or some other method to display the laboratory results of the lead analysis. Where a minimal disturbance of lead will occur, include Specification Section 01525 "Safety Requirements". The drawing note will also reference this Specification Section. Therefore, Specification sections 13282 or 13283 would not apply.

### **6.1.4 Contaminated Soil**

Provide separate Environmental drawings or use civil drawings that indicate the extent of known or suspected soil contamination. Indicate the type and level of contamination and refer to the appropriate specification for instructions on how to handle the contamination.

## **6.2 Construction Estimate**

Include specific data in the construction cost estimate for labor, equipment, and material, insurance, overhead and profit, permit fees, air monitoring, and disposal costs. Cost estimates should include all specialized equipment and materials the contractor may need to perform lead removal, such as scaffolding, lifts, or self-contained vacuum blasting systems. Provide as a separate item, an estimate for independent clearance testing for housing or child-occupied facility projects.

## **7. Design Submittals**

### **7.1 35% Design Development Submittal**

- **Basis of Design-Environmental Contents**  
Provide information as discussed in Sections 2 through 4 above
- **Environmental Report and Calculations**  
Provide the report and calculations as discussed in Section 5 above
- **Drawings, Specifications, and Cost Estimate**  
Drawings shall indicate preliminary location of any environmental areas of concern. At least one Environmental drawing shall be started to show the layout of the work. Provide an index of technical specification sections that will be developed. Provide the construction cost estimate identifying specific cost items.

### **7.2 100% Prefinal Submittal**

- **Revised Environmental Report and Calculations**  
A revised environmental report shall be prepared based on comments from the 35% submittal, if applicable. Final calculations for all environmental work shall be submitted
- **Drawings, Specifications, and Cost Estimate**  
Drawings shall indicate locations of paint with lead or materials containing lead. All existing lead levels determined from the field survey must be indicated on the drawings by a chart or some other method to display the laboratory results of the lead analysis. Edit the appropriate Specification Section and provide cross-reference to the drawing. Provide a revised construction cost estimate as necessary, based on project changes and comments.

### **7.3 Final Submittal**

- **Final Environmental Report and Calculations**  
The final environmental report and calculations shall be included with the project specifications.
- **Drawings, Specifications, and Cost Estimate**  
The final Environmental drawings must be stamped by a registered architect or engineer. For residential LBP hazard abatement projects, include signature of the Certified Lead Project Designer appropriately licensed in the State where the work is to be accomplished. Provide responses and corrections to prior comments. Provide final construction cost estimate.

## **8. Specialized Requirements**

### **8.1 State and Local Regulations**

State or Local regulations regarding lead may require specific licensing, testing, notification, work practice and engineering controls wipe sampling, clearance sampling, or specialized disposal. The designer must research the applicable provisions of these requirements as they relate to the project. Traditional housing renovation projects are not classified as lead-based paint abatement.

### **8.2 Overseas Final Governing Standards (FGS)**

The Final Governing Standards may provide supplemental information on the standards to be used for Navy designs at activities in an overseas location. The A&E shall comply with all requirements of the FGS for the country/host nation where the Activity is located. For projects that are designed to abate lead-based paint hazards in housing or child-occupied facilities, a certified Lead Project Designer must prepare all lead drawings and specifications. If the country has no designer certification requirements then the certification must be from the United States. If the country has designer certification requirements then the lead designer must possess that certification and provide their name on the drawings and specification.

## **9. Post Construction Award Services (PCAS)**

Independent technical construction support or clearance testing services may be requested through PCAS. These services generally include providing trained and licensed personnel to perform consultation, inspection, independent air monitoring, clearance sampling or other testing during construction.

**SCOPE OF WORK  
FOR PERFORMING  
ASBESTOS AND LEAD SURVEYS  
FOR CONTRACT # Nxxxx-\_\_\_\_\_**

**1.0 GENERAL REQUIREMENTS**

1.1 The fee proposal for this project shall include the cost for sampling and analysis of [\_\_\_\_\_] bulk samples by polarized light microscopy (PLM) and the sampling and analysis of [\_\_\_\_\_] paint bulk and wipe samples by atomic absorption spectrophotometry (AA) or anodic stripping voltametry (ASV). Collection and analysis of [\_\_\_\_\_] samples using the toxicity characteristic leaching procedure (TCLP) for lead shall be included in the fee proposal. All labor hours necessary to complete sampling and reports shall be included in the fee proposal. Government will pay for additional sample analysis if necessary based on unit prices. Transmission Electron Microscopy (TEM) analysis of selected bulk materials may be requested by the government. Include in the fee proposal costs for the following analyses based on a quantity schedule:

- a. Unit cost for PLM/DS analysis
- b. Unit cost for TEM analysis
- c. Unit cost for AA or ASV lead analysis
- d. Unit cost for TCLP lead analysis

**2.0 SAMPLING PLAN**

Submit a proposed schedule for sampling including building area, date and time. This schedule is necessary to coordinate access to secured areas and allow advance notice to building occupants. The schedule must be approved by the activity asbestos program manager (APM) or designated representative prior to sampling. Collect samples during the design site work phase. Refer to Enclosure (1) for additional information on sampling protocol. Notify the APM or designated representative when site work will be performed.

**2.1 MATERIALS**

**2.1.1 Asbestos**

Identify all friable and non-friable ACM that will be impacted by the project as required by 40 CFR 763 Asbestos Hazard Emergency Response Act (AHERA); 40 CFR 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAPs); and 29 CFR 1926.1101 OSHA Occupational Exposure to Asbestos in Construction, including but not limited to:

- a. All surfacing (spray-applied or troweled-on) materials
- b. All thermal system insulation on pipes, boilers and ducts.
- c. All miscellaneous forms such as wallboard and joint compound, ceiling tiles, floor tiles and mastic, and any other material suspected of containing asbestos.

Inspections shall be performed by personnel currently maintaining EPA building inspector accreditation. Specific state or local licensing may be required for the project.

Collect 10% duplicate (side by side) samples of difficult matrix materials (such as; floor tile, mastic, wallboard, joint compound, construction mastics, and roofing).

#### 2.1.2 Lead

Evaluate all painted surfaces that will be impacted by the project for lead. If an X-ray Fluorescence (XRF) instrument is used, the results can only be used as a positive screen (i.e., to determine that lead is present at significant levels). Classify the results as positive, inconclusive or negative according to the EPA Performance Characteristics Sheet (PCS) for the instrument. Inconclusive results are to be treated as positive for the presence of lead. Negative XRF readings require paint chip sampling and analysis. Collect and analyze 5% of the inconclusive XRF readings to verify the presence of lead. **Paint is identified as containing lead for construction projects if any levels are present as determined by a valid detection method (Limit of Detection criteria is 0.01%).** Collect soil and wipe samples as necessary to identify potential lead hazards for the project. Use applicable current ASTM, EPA, Title X and HUD guidelines for paint, soil and wipe sample criteria. Personnel conducting site work should be trained as a lead inspector and/or risk assessor by an EPA accredited training provider, unless work is considered a lead-based paint activity per 40 CFR 745 where certification is required.

### 2.2 AREAS TO BE SURVEYED

The survey shall include:

- a. All areas related to the project in buildings and structures, interior and exterior, where ACM or lead-containing materials could occur (i.e. for asbestos; building spaces, crawl spaces / attics, steam and hot water piping, furnaces, boiler rooms, asbestos insulated duct work, heat exchangers and any other structures, utility lines or equipment insulated with/or suspected of containing asbestos that may become airborne when disturbed through scheduled construction activities).
- b. Data on ACM located in inaccessible areas as determined by drawings, field inspection and past or present bulk sample testing for ACM or lead.

### 2.3 LABORATORY ANALYSIS

In areas where suspect materials have been identified, bulk sample analysis is required to positively confirm the presence of asbestos or lead. Laboratories selected for this analysis shall meet specific accreditation, as well as asbestos and lead identification program participation requirements. Section 2.3 shall be provided to the laboratory selected to perform analysis of all samples. Laboratories used for bulk analysis shall conform to the following:

- a. **Sample sets of homogeneous materials for asbestos shall be analyzed until a positive identification of asbestos is made. For example, if Sample #1 of a set of seven is identified as asbestos-containing the other samples are not analyzed and are assumed to contain asbestos since they are the same homogeneous material.**

- b. Be accredited by the American Industrial Hygiene Association (AIHA) for asbestos and lead or the American Association of Laboratory Accreditation (A2LA) for lead.
  - c. Be accredited by the National Institute of Standards and Technology National Voluntary Laboratory Accreditation Program (NIST/NVLAP) for PLM analysis and the National Lead Laboratory Accreditation Program (NLLAP) and Environmental Lead Proficiency Analytical Testing Program (ELPAT) for paint chip, dust, and soil analysis.
  - d. All samples collected for asbestos shall be analyzed using polarized-light microscopy with dispersion staining (PLM/DS). Results indicating >1 - 10% ACM are not required to be point counted. These results are accepted as asbestos-containing by the government. Results reported as <1%, or trace, are required to be pointed counted. The laboratory may supply point counted results at no additional charge.
- A limited number of TEM analyses may also be authorized by the Government to validate some of the negative PLM/DS sample results. Where state or local law requires TEM analysis, analyze samples by PLM/DS first. If results are negative by PLM/DS proceed with TEM analysis.
- e. All bulk (destructive) collected for lead shall be analyzed by atomic absorption spectrophotometry (AA) or anodic stripping voltametry (ASV). Limit of detection in paint for construction purposes is 0.01% by weight.
  - f. Provide evidence of internal statistical quality control (i.e., duplicate, replicate, spikes, and blanks, etc). Provide evidence of external statistical quality control listing interlaboratory QC results, PAT and/or ELPAT, NIST/NVLAP or other laboratory proficiency program results.
  - g. Provide an acceptable chain-of-custody record for sample handling and data recording.
  - h. Provide a copy of the laboratory's accreditation with laboratory results.

2.3.1 In addition to the above laboratory requirements, provide the following services:

- a. Submit duplicate samples (identified in 2.1.1 above) to another laboratory for quality assurance (QA) analysis.
- b. Include all laboratory certificates of analyses or test reports, including QA results, as appendices to the report (identified in section 3.0).

## 2.4 HAZARDOUS WASTE

Determination of components and materials as hazardous or solid waste shall be performed in conjunction with site work. Components which will be demolished and disposed as part of the project shall be sampled using the toxicity characteristic leaching procedure (TCLP) for lead in accordance with the provisions of 40 CFR 261, Subpart C. Destructive testing of components is required. Testing includes, but is not limited to collecting subsamples of baseboards, window

systems, doors, and walls. Collect adequate amounts of subsample materials to provide 3 composite samples. Patch and repair occupied areas with suitable materials (joint compound or caulking). Four ounces (110 grams) of material is required for a composite of subsamples. Subsamples shall be proportioned to components identified for disposal. When decontamination procedures of drill bits or core tools are performed, a rinse water sample shall be submitted for TCLP lead analysis. Enclosure (2) provides additional guidance on sample collection and analytical results.

### **3.0 REPORT**

3.1 Submit a report in accordance with the A/E guide for performing services. In addition, the report shall include:

- Name and certificate/license number of building inspector(s).
- Copy of current certificate/license
- Copy of testing laboratory accreditation
- Copy of all laboratory certificates of analysis, including QA results
- Copy of Asbestos Project Designer accreditation (for design specifications) for asbestos projects

## ENCLOSURE (1)

### Field Sampling Procedures:

- a. Bulk sampling shall conform to current requirements of applicable established Environmental Protection Agency (EPA) 40 CFR 763 AHERA guidelines; 40 CFR 61 Subpart M-National Emission Standard for Asbestos; Occupational Safety and Health Administration (OSHA) 29 CFR 1926.1101 Asbestos Construction Standard; EPA-560/5-85-030A Asbestos in Buildings- Simplified sampling scheme for surfacing materials; EPA-560/5-85-024 Guidance for Controlling Asbestos-containing Materials in Buildings.
- b. Comply with all safety and health requirements set forth in OSHA Standard 29 CFR 1910.1001 Asbestos Industry Standard, 29 CFR 1926.1101, 29 CFR 1910.1025 Lead Industry Standard and 29 CFR 1926.62 Lead Construction Standard.
- c. Repair all suspected ACM and painted surfaces disturbed for sampling purposes to maintain the integrity of the area. Use colored or tinted encapsulants to indicate repairs.
- d. Perform sampling in such a way as not to endanger the health of personnel working in the area by ensuring that asbestos fibers or lead dust will not be released during the sampling process. **Sampling in occupied administrative areas shall be performed after normal working hours unless approved by the activity APM or designated representative.**
- e. Label each sample and location with a unique sample ID number. This number shall also be on the sampling container sent to the laboratory for analysis. Record the ID number and the sample location on a sampling area sketch (see U.S. EPA Document 560/5-85-030a for guidance on sketches required) and in a chain of custody log or survey form. Provide descriptive location information, such as floor, column and room numbers, to assure rapid identification at any future time by Naval personnel.
- f. Take reasonable measures (such as closing doors) to secure an area which is found to be an imminent hazard. Notify the activity APM or designated representative immediately of the imminent hazard. The activity APM or designated representative will notify the appropriate authority.
- g. Planning, monitoring and directing the survey should be under the direction of an American Board of Industrial Hygiene (ABIH) Certified Industrial Hygienist (CIH), or Certified Safety Professional (CSP) trained and qualified in asbestos and lead sampling and control work. The CIH, CSP or other qualified person and those working under his direction on the project, shall have completed an EPA approved training course for Building Inspector and shall have passed the course examination. Documentation of lead inspector training shall also be required. The Contractor shall provide proof of compliance by submitting the name, address, telephone number, a copy of the CIH's or CSP's-in-Charge certification (or Qualified Person's training documentation), and evidence of the successful completion of the EPA and/or State course and examination prior to beginning work on the project. Copies of the training certificates of those working on the project under the direction of the CIH, CSP, or Qualified Person are also required prior to starting work at the site. No work will be authorized without prior approval and receipt of the required certifications.



## ENCLOSURE (2)

### Waste Characterization:

- a. Determine waste streams for the project which will identify waste for disposal. Building components which will be classified as debris shall be sampled to determine whether the waste will be hazardous or solid.
- b. Segregate and sample building components by type (doors, windows, etc) in accordance with 40 CFR 261. The most common components for sampling are wood, wallboard, plaster, cement and brick. Building components, such as glass, wiring, aluminum siding, piping, or other recyclables shall not be included in the composite. Submit a single composite sample, consisting of subsamples from a building for TCLP lead analysis for building demolition projects. Submit single composite samples of building segregated components (doors or windows, etc) for renovation projects. Toxic substances (suspect asbestos, light ballasts, and transformers) shall be sampled and handled separately.
- c. Calculate the total volume of components identified for disposal prior to sampling. Surface area (square feet) times component thickness provides cubic feet dimensions. Convert to cubic yards to identify the volume of each component for disposal. Calculate the total volume of debris adding the volume of each component. Collect subsamples of each component in a proportional ratio to the total volume.
- d. Collect subsamples of individual components by using clean drill bits or other similar coring tools. Clean polyethylene, paper or a similar material shall be placed below the sampling area during collection. Remove residual dust, shavings and materials on the collection device and include with the subsample. Transfer the subsample material (eg- drill shavings) to a clean container, such as an unused self-sealing plastic bag or clean plastic or glass container. Wood shavings or pulverized masonry provide the best materials for analysis and minimize additional laboratory preparation or bias. Number, identify and record each subsample.
- e. Decontaminate or dispose of drill bits or coring tools when a different component is to be sampled. Several subsamples of the same component may be collected prior to decontamination. Decontamination shall consist of brushing the bit or coring tool with tap water and soap. Final rinse shall be done with distilled, deionized, filtered (DDIF) water. Collect and submit the final rinse water, designated as a rinsate blank, for a quality control sample.
- f. Submit a composite sample for analysis by combining proportionate amounts of each subsample. The composite sample shall be approximately 4 ounces (110 grams) and be representative of all subsamples. Hold remaining subsamples for additional analysis, if required.
- g. If results of TCLP analysis are  $<5$  mg/kg (ppm) of lead the waste is identified as a non-hazardous solid. No further analysis is required. Hold subsamples for further disposition or return to the government.

h. If results of TCLP analysis are  $>5$  mg/kg (ppm) of lead an additional analysis shall be required. Compare subsamples to initial lead survey results. Components which were initially identified as low content of lead (XRF or paint chip) shall be included in the second composite. If the result of the second TCLP analysis is  $<5$  mg/kg (ppm) the subsampled components shall be identified as solid waste. Subsampled components NOT submitted shall be identified as hazardous waste.

i. For total building demolition projects not precharacterized on the basis of generator knowledge, core samples of the entire building thickness are required. Follow the above procedures as required for waste characterization.

**GOVERNMENT EDITING INSTRUCTIONS  
AND  
COST GUIDANCE FOR  
ASBESTOS / LEAD SCOPE OF WORK**

**EDITING INSTRUCTIONS**

**BULK SAMPLES FOR ANALYSIS** (Edit A/E Scope of Work in Gen Reqmts)

Asbestos and Lead Paint chip samples are calculated using the same formula. Assumptions are:

- A. An X-Ray Fluorescence (XRF) meter is not being used.
- B. No previous asbestos survey data is available.

Number of samples for **each** is estimated by the following:

- 1. Determine Total Square Footage of building(s) in project
- 2. Divide Total Sq Ft by 400 (Assumes 1 sample per 400 sq ft)
- 3. Round up to nearest 10.

EXAMPLE: Housing modernization project of 100 units @ 950 sq ft/ea

Total Sq Ft = 95,000

Divide by 400 = 237.5 samples

Number of Samples = 240 (for asbestos and 240 for lead)

- NOTES:**
- 1. If an activity asbestos survey has been conducted, or building involved has similar rooms throughout (BEQ, BOQ) the number of samples should be reduced by 50%. In the above example, samples would be reduced to 120 each.
  - 2. A building demolition would **ADD** 10 - 20% to the original total of 240 (i.e. 265 - 290) for Asbestos samples only.
  - 3. If an XRF meter is used to screen positive and inconclusive (assumed positive) lead paint reduce the number for paint chips by 50%.

**HAZARDOUS WASTE DETERMINATION**

Determination of Hazardous Waste should be performed in conjunction with the Site Work phase of a project where building component disposal or demolition debris will be generated. This characterizes the types of waste which will result (hazardous vs. solid) to develop the estimated construction cost. Destructive testing of components (drilling holes in baseboards, window systems, etc) is necessary. Typically 4 ounces (115 grams) of material is needed for a sample. Enough

subsample materials should be collected as composites to produce 3 samples. An additional sample of rinse water is also collected from the decontamination of sampling equipment for quality control purposes.

The initial TCLP sample includes subsamples of all components for demolition and disposal.

## **COST GUIDANCE**

### **Labor Effort**

Survey (Site Work) with Design Effort is calculated at a rate of 7,500 sq ft / day for a 2 person team. This assumes some knowledge of site/building conditions, such as year built, scope of project work, and any previous asbestos or lead results. Site Work ratios are 1 IH to 3 IH Techs, or 1:1 for smaller projects. Asbestos/lead report preparation is calculated at 50% of the technical Site Work labor effort.

Certified Industrial Hygienist(CIH)/Certified Safety Professional (CSP)/Qualified Person(QP) provides Project Management oversight, technical guidance and review/signature of final report. Project Management for the asbestos/lead site work is estimated at 10% of the technical labor effort hours.

Specification Section editing by Designer: 6 hrs for 13281 and 8 hrs for 13283.

Site Work labor is estimated by the following:

1. Determine Total Sq Ft of building(s) in project
2. Divide Total Sq Ft by 7,500 Sq Ft/Day
3. Round up to nearest Day

### **Example:**

100 units @ 950 Sq Ft/ea for modernization/repair.

95,000 Total sq ft Divided by 7,500 sq ft/day = 12.6 days

Number of Days = 13 X 2 person team = 26 days (Site Work)

Report Prep @ 50% of Site Work = 13 days

Site Work and Report Prep = 39 days

Asbestos @ 39 days + Lead @ 39 days = 78 days TOTAL Labor

Personnel Hourly Rates:

CIH/CSP/QP - \$50 - 65 (Similar to Technical Proj Mgr)  
IH/ENGR - \$30 - 35 (On-site Coord & Supervision)  
IH Tech - \$20 - 25 (Inspection & Sample Collection)  
Proj Des- \$35 - 45 (Reqd for Asbestos Spec Section)

Sample Analysis (Cost for sample collection is in Labor Effort)

PLM - \$8 - 12 (Point Counting add \$20/sample)  
TEM - \$100 - 125 (air or bulk)  
AA - \$8 - 12 (paint chip, wipe or soil for lead)  
TCLP - \$70 - 125 (Lead ONLY)

XRF Rental (Averaged at weekly rates only)

Weekly Rental - \$900 – 1,000  
Own/Operate - \$700 - 800 /week (\$100/day)

Waste Characterization Effort

This effort is labor intensive due to calculation of volumes of components and sample set up and collection. Sample collection is project dependent, such as replace windows and doors versus total modernization and repair. Typically allow 1-3 days for sample collection depending on size of project. Assume 2 person team to perform sample collection. Sample collection costs are included in the labor and analytical costs are for TCLP analysis. Allow 50% of the labor effort for report preparation.

Other Direct Costs are standard such as Per Diem, Clerical, Printing & Shipping.

**SCOPE OF WORK  
LEAD-BASED PAINT INSPECTION AND RISK ASSESSMENT  
AND ASBESTOS SURVEY  
FOR RESIDENTIAL PROPERTY TRANSFER**

Proj:  
Amend:  
Date:

**1.0 GENERAL REQUIREMENTS:**

Provide all labor, supervision, and materials necessary to conduct a comprehensive lead-based paint (LBP) Inspection and Risk Assessment in accordance with HUD (24 CFR 35, Subparts B, C, and R), and EPA (40 CFR 745, Subparts D, L and Q) and as specified herein. Perform an asbestos-containing materials (ACM) inspection in accordance with the Department of Defense (DoD) Base Realignment and Closure (BRAC) Policy and as specified herein. Develop appropriate sampling strategy, identify, sample, and document the presence of LBP, LBP Hazards and ACM hazards; rank hazards; and develop a cost estimate for asbestos hazard removal, lead abatement, and alternate material replacement. Document all homogeneous areas, both positive and negative for LBP and ACM. All personnel performing asbestos and lead inspection, sampling and other related management activities under this contract shall be accredited by either the USEPA, or certified by the State or Tribal program for the appropriate area of work for which they will perform. Comply with all applicable Federal (with special emphasis on GSA requirements for property transfer), and applicable State requirements including the 29 CFR 1926.1101 and 29 CFR 1926.62 requirements. Asbestos inspectors shall comply with these asbestos requirements to perform Class III work during sample collection. Prepare and submit a written report as described herein. Use the Alternate Formats for LBP Inspection and Asbestos Survey work. Provide a separate estimate for Priced Option 1 attached to the Scope of Work.

**References**

- a. 24 CFR 35, Subparts A, B, C, & R HUD LBP Requirements
- b. 29 CFR 1926.62 OSHA Lead Construction Standard
- c. 29 CFR 1926.1101 OSHA Asbestos Construction Standard
- d. 40 CFR 745, Subparts D, L, & Q EPA LBP Requirements
- e. 40 CFR 763 AHERA and ASHARA as Amended
- f. 41 CFR 101-47 GSA Fed Property Mgmt Regulations: Utilization and Disposal of Real Property
- g. DoD BRAC Policy Asbestos, Lead Paint and Radon Policies at BRAC Properties (31 Oct 94)
- h. HUD Guidelines 1995: Chapter 5, and Chapter 7 1997 Revision
- i. American Society for Testing and Materials (ASTM) E-6 Standards for Lead
- j. EPA 747-R-95-001 Residential Sampling for Lead: Protocols for Dust and Soil Sampling, March 1995

## **1.1 Location:**

The work is located at various Navy Activities and requires the testing of LBP and Asbestos as specified herein. Use the Alternate Formats described in Section 1.2.2 for LBP Inspections and 1.3.2 for Asbestos Survey. The Navy will provide LBP Inspection and Asbestos Survey data. See Attachment 1 for the specific location and quantities of work to be performed.

## **1.2 LBP Inspection and Risk Assessment Description:**

### 1.2.1 LBP Inspection Standard Format

Perform LBP Inspection in accordance with references a, d, h, i, and j where no prior information exists. Use accredited inspector personnel. Perform a walkthrough survey of all remaining units as part of the combination Inspection and Risk Assessment (and Asbestos Survey). Use the HUD tables for year constructed and number of units to determine the quantity of housing to be inspected where no prior information exists.

Identify either single-family or multi-family units and group them according to community type (i.e. 20 multi-family units pre-1960 construction-- inspect all; but test 16 if 1960-77 construction, 100-109 units of same type-- test 45 if pre-1960, or 25 if 1960-77 construction—See HUD Guidelines Chapter 7 1997 revision for table). The inspection shall include all painted interior and exterior surfaces by determining appropriate testing combinations.

X-ray Fluorescence (XRF) instruments require daily calibrations and instrument specific XRF Performance Characteristics Sheets (PCS). Follow appropriate radiation safety procedures as required by the Nuclear Regulatory Commission and applicable State or local regulations. Follow HUD protocols and the PCS to determine necessary substrate corrections and classify results appropriately as Positive, Inconclusive, or Negative.

Collect paint chips of Inconclusive XRF readings in single-family housing units. Paint chip samples shall be collected in inconspicuous locations where feasible. All layers of paint shall be included in the sample, which should be devoid of substrate material.

Provide appropriate handwritten forms (if used) that are clearly written, legible, and reproducible. Provide a written report in accordance with 40 CFR 745.227(b)(4) and as outlined in Section 3.0.

### 1.2.2 Alternate Format

Use this LBP inspection format where prior information exists or interior / exterior components have been replaced after 1978 (such as, whole house revitalization or major maintenance projects). Verify and validate by additional testing to confirm or refute a prior finding or other provided information. Test two units per 50 or a fraction thereof for each community type where similar or all components have been replaced after 1978. Perform a walkthrough inspection of all remaining units and document the findings. Determine if there are any units in the same community type, which have not had component replacement, significant renovation, or where other testing anomalies exist. Use the HUD Guidelines Chapter 7 1997 Revision for these non-renovated units to determine the number of units to be tested.

### 1.2.3 Risk Assessment Standard Format

Conduct the LBP Risk Assessment in accordance with HUD Guidelines Chapter 5, Risk Assessment and 40 CFR 745, Subpart L. Use HUD Chapter 7, Table 7.3 to determine the number of units for performing risk assessments. Perform a Visual Assessment of all units and document the following;

- condition of the building,
- deteriorating painted surfaces,
- areas of visible dust accumulation,
- bare soil areas,
- friction and impact surfaces,
- evidence of teeth marks or chewed painted surfaces.

### 1.2.4 Alternate Format

Perform a soil risk assessment only for units where exterior components have been replaced since 1978. Use the targeted sampling strategy, HUD Chapter 5, Table 5.6 for soil risk assessments at these units.

### 1.2.5 Risk Assessment Housing Sampling Protocol

Collect dust and soil samples to determine the presence of LBP Hazards as identified in 40 CFR 745, Subpart D. Use single-surface dust sampling protocols and collect samples in the following areas; Entryways (including porches), Children's principle play area, Children's bedrooms, Kitchen, and Bathroom. Surfaces to be tested shall include floors, interior window sills (and troughs of frequently opened windows), and cabinets with deteriorated paint. Where common areas are present in multi-family housing additional single-surface wipe samples shall be collected from the entry area floor, first story landing, and common hallway, or other common area frequented by children. Collect a minimum of three bare soil samples; however, if no bare soil is present, sampling is not required. Where bare soil is present, collect one composite sample to represent children's play areas, one composite sample to represent the dripline, and the other to represent a mid-yard composite (excluding the dripline). Provide the arithmetic mean of the soil samples to determine a yard average.

### 1.2.6 Risk Assessment Child-occupied Facilities Sampling Protocol

Collect single-surface dust samples from surfaces or areas where deteriorated paint is present. Collect single-surface dust samples from floors and window sills (and troughs of frequently opened windows) in each room, hallway or stairwell in Child Development Centers or other child-occupied facilities that are used by children, age 6 and under. Collect additional single-surface dust wipes where children may come into contact with dust. Collect bare soil samples in children's play areas associated with Child Development Centers, child-occupied facilities, and Tot-lots. Where mulch or other removable ground cover is present, collect soil samples immediately beneath these surfaces. Soil sampling is not required where impermeable covering is present (asphalt or rubber composite material).

### 1.2.7 Laboratory Analysis of Samples

Collect samples and submit to the accredited laboratory with an appropriate chain of custody. The laboratory performing the analyses shall be currently accredited for lead analysis (for each type of analysis performed—paint, dust, or soil) under EPA's National Lead Laboratory



Accreditation Program (NLLAP). Provide laboratory quality assurance data, laboratory accreditation certificate and Certificates of Analysis for all samples analyzed.

#### 1.2.8 Additional Information and Requirements

Water sampling is not included, as it is part of the Safe Drinking Water Act requirements.

Identify LBP hazards for single family or multi-family housing and prepare a report as required by 40 CFR 745.227(d)(11) and as outlined in this scope, Section 3.0 Reports.

### **1.3 Asbestos Survey Description:**

#### 1.3.1 Asbestos Survey Standard Format

Survey the same units (selected for LBP Risk Assessment) for asbestos. Use the Homogeneous Area protocol to sample ACM in multi-family community units—same materials constructed at same time, use (i.e. 200 square feet of green 9 X 9 kitchen floor tile distributed through 500 units would require a minimum of 7 samples to represent all kitchens). Perform a walkthrough of all other housing units to sample, identify, and document any different materials or conditions. The LBP Inspection and Asbestos Survey walkthroughs should be combined to minimize schedule disruption when occupied housing units will be inspected.

Follow the USEPA Asbestos Hazard Emergency Response Act (AHERA) and EPA 560/5-85-030a “Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials” sampling and assessment methods. Use Homogeneous Area Positive Stop analytical protocol for laboratory analysis of samples.

Sample all interior/exterior suspect materials, including but not limited to: thermal system insulation (pipes, duct wrap, breaching), surfacing materials (including decorative, sprayed-on, or textured coatings), and miscellaneous materials such as; floor tiles, construction mastics, ceiling panels, drywall and joint compound (as composite samples), and roofing materials (excluding rubber membrane and full-depth core samples). All sample locations shall be resealed upon completion of sampling.

Survey areas include all accessible spaces including, basements, crawl spaces and attics. Record the Homogeneous Area, location, condition, and quantity of the sampled materials or suspect ACM. Document all information required to prepare a cost estimate for the removal of friable, accessible, and damaged asbestos.

#### 1.3.2 Asbestos Survey Alternate Format

Use this format where prior Asbestos Survey information exists or significant renovation (such as, whole house revitalization or major maintenance projects) has occurred since 1990. Verify and validate by additional testing to confirm or refute a prior finding or other provided information. The purpose of the survey is to identify the presence of ACM that is friable, accessible and damaged (FAD). Document FAD conditions or note where ACM was previously located and has been replaced. Sample only those suspect materials that are FAD, were not previously sampled, or are different than prior information provided.

Survey the same units for asbestos as are identified for the LBP Risk Assessment. Perform a walkthrough inspection of all remaining units and document the findings. Determine if there are

any units in the same community type, which have not had significant renovation, or where other testing anomalies exist. Use the HUD Guidelines Chapter 7 1997 Revision, Table 7.3 for these non-renovated units to determine the number of units to be surveyed for asbestos.

Survey areas include all accessible spaces including, basements, crawl spaces and attics. Record the Homogeneous Area, location, condition, and quantity of the sampled materials or suspect ACM. Document all information required to prepare a cost estimate for the removal of friable, accessible, and damaged asbestos.

#### 1.3.4 Laboratory Analysis of Samples

Collect samples and submit to the accredited laboratory with an appropriate chain of custody. Collect an additional 10% of difficult matrix samples (i.e. floor tile, roofing, mastics, textured paints or plasters) for QA/QC purposes and submit to another accredited laboratory. Samples shall be submitted and analyzed by Homogeneous Area and the laboratory shall analyze samples using a Homogeneous Area Positive Stop analysis protocol. The laboratory performing the analyses shall be currently accredited by the National Institute of Standards and Technology/ National Voluntary Laboratory Accreditation Program (NIST-NVLAP) for Bulk Asbestos. Analyze samples by polarized light microscopy (PLM) with dispersion staining using EPA method 600/R-93/116. Point counting of samples greater than one percent (>1%) asbestos is not required, but may be provided at no additional expense. Point counting for samples less than one percent (<1%) is required. Individual samples with multiple layers will be invoiced for the number of layers analyzed. If applicable, TEM analysis may be used to analyze negative floor tile or other nonfriable organically bound materials. Provide laboratory accreditation certificate with the Certificates of Analysis for all samples.

#### 1.3.4 Additional Information and Requirements

Prepare and submit a report that documents the location and condition of identified ACM and as outlined in Section 3.0

## **2.0 PROJECT COORDINATION:**

A kick-off meeting shall be scheduled at the Activity to set up and identify special issues associated with the project. The Engineer in Charge (EIC) may attend the meeting with the Activity representative and Contractor. Appropriate Departments, such as Housing, Security, Environmental, NAVOSH should attend the kick-off meeting.

Work shall be scheduled and coordinated in advance with the on-site Activity representative, who will provide support including; letter(s) of introduction, or temporary identity cards/papers in compliance with current base security regulations, access to buildings that are to be inspected, and general assistance in scheduling inspections.

Records Search. Review existing reports (such as, Public Works Center Lead and Asbestos Reports) and available plans to identify areas requiring inspection and sampling. Existing reports may contain useable data; however, verify and validate existing report information and update as necessary to identify existing site conditions. Copies of available building drawings may be made during this task.

During the site work, report any immediate hazard conditions to the Activity representative.

### **3.0 REPORTS:**

Prepare an Executive Summary of the LBP Inspection that defines LBP, briefly explains the regulatory requirements for LBP inspection (associated with transfer of Federally-owned Residential Property), and whether LBP was present in the units and where it is located. Develop a table by housing/community type or child-occupied facilities that lists the specific locations of components that tested Positive by XRF or paint chip analysis. In addition, list all assumed Positive (by XRF Inconclusive reading) results. Organize the table by the housing unit types (single-family), community (multi-family), or child-occupied facility (including Tot-lots). Incorporate all prior information to provide a comprehensive report.

The LBP inspection report shall be tabbed, organized, and contain the regulatory requirements as identified in 40 CFR 745.227(b)(4).

The LBP Risk Assessment may be compiled with the LBP Inspection report. Develop an Executive Summary that includes the regulatory definitions of LBP hazards and requirements based on the year of construction as identified in 24 CFR 35 Subpart C. Include a brief summary of applicable State or Local regulatory requirements that supercede or differ from EPA and HUD requirements. Prepare a table based on housing/community type or child-occupied facilities that identifies LBP Hazards.

Prepare an Asbestos Survey report with an Executive Summary that identifies asbestos hazards and locations. Provide a table of the common locations of ACM listed by building. Identify the regulatory and policy requirements for asbestos per the Federal Property Management Regulations 41 CFR 101-47 and the DOD BRAC Policy for asbestos. Incorporate all prior information to provide a comprehensive report.

Obtain digital photograph(s) of representative buildings, building conditions, and typical or unique sample locations (excluding restricted or sensitive areas requiring authorization from base security). Provide digital copies of all photos on a compact disc (CD) in high- resolution jpg format.

Prepare a cost estimate (separate from the Report) for Abatement of LBP Hazards in pre-1960 constructed housing where they were identified. Prepare a similar cost estimate for the removal of friable, accessible, and damaged (FAD) ACM.

Provide both paper and electronic reports. Paper reports shall be bound, tabbed, and organized. Electronic reports shall be on CD-ROM formatted for use with MS Windows 2000, MS Office Suite (Word, Excel, Power Point), MS Internet Explorer 5.1 and MS Photo Editor (LAN based). CD-ROM shall be compatible with EIC and Activity computer systems.

### **3.1 Schedule of Proposed Milestones:**

The A/E shall begin work upon receipt of contract document and pursue the work diligently in accordance with the date schedule established therein. Provide a monthly assessment of the schedule to both the project EIC and Activity Representative.

## CONTRACTOR SUBMITTAL

### Planning;

- a. Submit to activity POC, the; Name, title, function, and social security number of each individual involved in facility survey. Provide proof of asbestos training and current certification.

- b. Field Investigation: Start date

- c. Pre-final Report: (95%) Due

- d. Final Report: (100%) Due

## CONTRACTOR SUBMITTAL DATES

Minimum of 2 weeks prior to field survey trip

xxx 200x

30 day after completion of field work

21 Days After Receipt of Government comments on Prefinal Report

### Project Submittal Requirements:

Upon completion of the various phases of work, the contractor shall furnish documents to the project EIC, Region and Activity as shown by the following:

	(EFD/A EIC)	Region	Activity
a. Monthly progress reports (one per month, through completion).	1	1	1
b. Prefinal report. Include; CD	1	1	1
c. Final report. Include; CD and previous review comments with reply noted	2	2	4

Any requested change/deviation in scope must be brought to the attention and/or approved by the Contracting Officer. In no case will changes to the contract scope be made at the Activity level or by any person other than the Contracting Officer.

### **Distribution of Reports / Points of Contact**

Activity Point of Contact/Telephone:

Will be provided separately for each activity following award

Engineer-in-Charge (EIC)/Telephone:

## PRICED OPTIONS

The Government will award Priced Options as needed. One or more Priced Options may be awarded at a time. Provide priced option estimate to show labor, supervision, administrative, report preparation, and other direct costs including unit prices for sampling.

### OPTION 1

#### LBP Risk Assessment Update:

Provide an Update to the initial LBP Risk Assessment where the transfer of residential property has not been completed and the Risk Assessment is more than 12 months old. Provided that the initial Risk Assessment was conducted as Random Sampling associated with LBP Inspection and has been conducted after August 30, 1999; follow the HUD Guidelines, Chapter 5: Risk Assessment, Table 5.6 Targeted Sampling protocol listed below.

Number of Similar Dwellings	Number of Dwellings to Sample
1 – 4	All
5 – 20	4 Units or 50% (whichever is greater)
21-75	10 Units or 20% (whichever is greater)
76-125	17
126-175	19
176-225	20
226-300	21
301-400	22
401-500	23
501 +	24 +1 Unit per additional increment of 100 units or less

If LBP Hazards have been abated and dust and / or soil clearance sampling has been achieved, include this data in the Risk Assessment Update report. Provide an Executive Summary that includes; discussion indicating this report updates the original Risk Assessment, the date(s) and summary of all Risk Assessment Update sampling, identifies that hazards are or are not present, and if abatement was conducted, a summary of clearance sampling and LBP Hazard Abatement report. Provide copies of all laboratory sample results collected for the LBP Risk Assessment Update and organize the report in a tabbed format.

## **APPENDIX B**

### **Asbestos & Lead Resources and Web sites**

## **Asbestos / Lead Resources & Web sites**

### **Federal Web sites**

<http://www.osha.gov/>

Contains Asbestos (29 CFR 1926.1101) and Lead (29 CFR 1926.62) regulations, interpretations, and compliance directives. Compliance directives explain how a compliance officer performs an inspection and gives more detailed explanations about the regulations. Phone (800) 424-9346

<http://www.osha-slc.gov/dts/osta/oshasoft/>

OSHA Expert Advisor software. The OSHA advisor series are "expert systems" that will provide responses based on questions you answer as a building owner. Both asbestos and lead advisors are available for downloading. OSHA Technical Manuals are included, which contains comprehensive discussions of regulations.

<http://www.epa.gov/opptintr/asbestos/>

EPA asbestos home page that contains regulations, information, documents and links to other sites.

Toxic Substance Control Act (TSCA) and Asbestos Information Service. Phone ONLY (202) 554-1404

<http://www.epa.gov/opptintr/lead/>

EPA's primary site for lead information with links to other related sites.

<http://www.hud.gov/offices/lead/>

HUD Office of Lead Hazard Control has access to several lead regulations, HUD Guidelines, Fact Sheets and other information pertaining to Housing and lead hazards

<http://www.epa.gov/docs/opptintr/lead/nlic.htm>

The National Lead Information Center (NLIC) provides the general public and professionals with information about lead hazards and their prevention. NLIC operates under a contract with the U.S. Environmental Protection Agency (EPA), with funding from EPA, the Centers for Disease Control and Prevention, and the Department of Housing and Urban Development.

<http://www.epa.gov/ncepihom/>

The National Service Center for Environmental Publications maintains and distributes EPA publications in hardcopy, CD ROM and other multi-media formats. The current publication inventory includes over 7,000 titles. NSCEP also develops and distributes the annual EPA National Publications Catalog.

### **DoD Web sites**

<https://www.denix.osd.mil/>

DoD subscriber web site with daily environmental updates, topical indexes, primarily focused on environmental programs. Contains links to other web sites

<http://www.dscr.dla.mil/htis/htis.htm>

Hazardous Technical Information Services Bulletin web site designed for DoD technical and regulatory developments in managing hazardous materials and wastes. Phone (800) 848-4847 or DSN 695-5168.

## **Navy Web sites**

<http://www.myhsg.navfac.navy.mil>

Navy Family Housing site includes a reference tool, **EHS Matrix**, and the on-line application **EHS Manager**, which provides unit specific Environmental, Health, and Safety information related to family housing. Passwords for this secure site may be requested at the initial screen. Access rights and authority (e.g., read vs. edit rights to which Activities/Regions) to **EHS Manager** will be based on users geographic responsibilities and needs.

<http://www.navfac.navy.mil/safety/>

Naval Facilities Engineering Command Safety and Health Home page provides information on Asbestos, Lead, and IAQ.

<http://enviro.nfesc.navy.mil/esc425/NoshArBr.htm>

Naval Facilities Engineering Service Center NAVOSH Indoor Air Branch provides technical support to activities, EFD/A's, PWC's for asbestos, lead, ventilation, and other indoor air hazards.

<http://safetycenter.navy.mil/training/default.htm>

NAVOSH Environmental Training Center provides EPA accredited asbestos training courses and other safety, health and environmental training

<http://www.housing.navy.mil>

Navy Family Housing public site includes the Family Housing specific reference tool **EHS Matrix**.

<http://www.safetycenter.navy.mil/>

Naval Safety Center

<http://www-nehc.med.navy.mil/>

Naval Environmental Health Center

## **Additional Sources**

<http://www.astm.org/>

American Society for Testing and Materials contains information regarding consensus standards. Various sampling, inspection and analytical methods are included.

<http://www.nibs.org/>

National Institute of Building Sciences provides consensus documents for lead and asbestos Operations and Maintenance work practices.



## **APPENDIX C**

### **Asbestos / Lead Points of Contact**

For a copy of this appendix please send an email to [PRTH\\_NFESCIAM@navy.mil](mailto:PRTH_NFESCIAM@navy.mil)

## **APPENDIX D**

### **Glossary**

<b>Abatement - Asbestos</b>	Control of asbestos beyond an operations and maintenance program that includes removal, enclosure, and encapsulation techniques.
<b>Abatement - Lead</b>	A measure or set of measures designed to permanently eliminate lead-based paint hazards or lead-based paint. Abatement includes: the removal of paint and dust, the permanent enclosure or encapsulation of LBP, the replacement of painted surfaces or fixtures, or the removal or permanent covering of soil, when LBP hazards are present. Abatement also includes all associated preparation, cleanup, disposal and post-abatement clearance testing.
<b>ACM or ACBM</b>	Asbestos-Containing Material or Asbestos-Containing Building Material. Any material containing more than one percent asbestos.
<b>Action Level (AL) - Lead</b>	An employee exposure, without regard to the use of respirators, to an airborne lead concentration of 30 micrograms per cubic meter calculated over an eight-hour time weighted average.
<b>Adequately Wet</b>	Sufficiently mix or penetrate with liquid to prevent the release of particulates or fibers. If visible emissions are observed coming from ACM, then that material has not been adequately wetted. However, the absence of visible emissions is not sufficient evidence of being adequately wet.
<b>AHERA</b>	Asbestos Hazard Emergency Response Act. An EPA regulation, 40 CFR 763, published 1987. AHERA requires all schools (K-12) to inspect and identify ACM their buildings, and develop and implement an asbestos management plan. In 1990, the reauthorization of the act extended training requirements to include personnel in public and commercial buildings and accreditation requirements to public and commercial buildings for persons who inspect for ACM, design response actions, or carry out response actions.
<b>Air Monitoring</b>	The process of measuring the asbestos fiber or lead content of a specific volume of air.
<b>APM</b>	Asbestos Program Manager. An activity representative who supervises all aspects of the asbestos management control program.
<b>Asbestos</b>	Chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos and any of these minerals that have been chemically treated and/or altered.
<b>Building Component</b>	Any architectural element of a building that may be painted or have dust on its surface, e.g. walls, stair treads, floors, railings, doors, window sills, etc.
<b>Child-Occupied Facility</b>	A building, or portion of a building, constructed prior to 1978, visited regularly by the same child, 6 years of age or under, on at least two different days within any week, provided that each day's visit lasts at least 3 hours and the combined weekly visit lasts at least 6 hours, and the combined annual visit lasts at least 60 hours.
<b>CIH</b>	Certified Industrial Hygienist. A Certified Industrial Hygienist (CIH) certified by the American Board of Industrial Hygiene
<b>Class I Asbestos Work</b>	Activities involving the removal of thermal system insulation or surfacing ACM/PACM.

<b>Class II Asbestos Work</b>	Activities involving removal of ACM which is neither TSI nor surfacing ACM. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.
<b>Class III Asbestos Work</b>	Repair and maintenance operations, where any ACM may be disturbed.
<b>Class IV Asbestos Work</b>	Maintenance and custodial activities during which employees contact ACM and PACM, and activities to cleanup waste and debris containing ACM and PACM.
<b>Clearance</b>	Visual examination and collection of environmental samples by an inspector or risk assessor, and analysis by an accredited laboratory upon completion of an abatement project, interim control intervention, or maintenance job that disturbs asbestos or LBP.
<b>Competent Person - Asbestos</b>	One who is capable of identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure. Additionally, a person who is specifically trained in a training course which meets the criteria of EPA's Model Accreditation Plan for project designer or supervisor, or its equivalent.
<b>Competent Person - Lead</b>	One who is capable of identifying or predicting hazardous working conditions and work areas, and who has authorization to take prompt, corrective measures to eliminate the hazards. A competent person is not necessarily a risk assessor, inspector, or abatement project supervisor.
<b>Compliance Plan</b>	A document that describes the types of tasks, workers, protective measures, tools, and other materials that may be employed in lead-containing paint hazard control to comply with the OSHA Lead Exposure in Construction standard.
<b>Construction Work</b>	Any work for construction, alteration, and/or repair, including painting and decorating.
<b>Containment</b>	A process to protect workers and the environment by controlling exposures to asbestos fibers or lead-contaminated dust and debris created during abatement.
<b>CSP</b>	Certified Safety Professional. A person who has passed the 2-day certification exam of the Board of Certified Safety Professionals, and who has at least 4 to 7 years experience in safety and an Associate in Safety or Bachelors degree.
<b>Decontamination</b>	Cleaning of contaminated areas, equipment, and personnel. Decontamination chambers include a clean room, and a dirty (contaminated) room, with a shower facility in between.
<b>Encapsulation</b>	The treatment of ACM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant), or penetrates the material and binds its components together (penetrating encapsulant).
<b>ELPAT</b>	Environmental Lead Proficiency Analytical Testing. A quarterly performance based testing program for paint, soil, dust, and air samples. Laboratories participate to assess and improve their analytical skills for lead analysis.

<b>Engineering Controls</b>	Measures other than respiratory protection or administrative controls that are implemented at the work site to contain, control, and/or otherwise reduce exposure to lead-contaminated dust and debris, usually in the occupational health setting. The measures include process and product substitution, isolation, and ventilation.
<b>Exposure Monitoring</b>	The sampling and analysis of air both inside and outside the work area to determine the degree of worker and resident exposure to lead or other airborne contaminants, often involving air sampling inside a worker's breathing zone.
<b>Friable</b>	Any material containing more than 1 percent asbestos which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. This may also include previously non-friable material which becomes broken or damaged by mechanical force.
<b>Generator</b>	Any person whose act or operation produces hazardous waste identified or listed in 40 CFR Part 261 or whose act causes a hazardous waste to come under regulation (40 CFR 260.10).
<b>Hazardous Waste</b>	As defined in EPA 40 CFR 261.3, hazardous waste is a solid waste or a combination of solid wastes that because of its quantity; concentration; or physical, chemical, or infectious characteristics may cause or significantly contribute to increases in mortality, serious and irreversible or incapacitating but reversible illnesses, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed. For lead-based paint abatement waste, HW is waste that contains more than 5 ppm of leachable lead as determined by the TCLP test, or is waste that is corrosive, ignitable, or reactive and not otherwise excluded.
<b>HEPA Filter</b>	High-Efficiency Particulate Air Filter. Such filters are rated to trap at least 99.97% of all particles 0.3 microns (0.3 $\mu\text{m}$ ) in diameter or larger.
<b>Housing/Target Housing</b>	Any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any one or more children age 6 years or under resides in such housing for the elderly or persons with disabilities) or any 0-bedroom dwelling.
<b>Industrial Hygienist</b>	A professional qualified by education, training, and experience to anticipate, recognize, evaluate, and develop controls for occupation health hazards.
<b>Inspector - Asbestos</b>	An individual who has completed an EPA/AHERA accredited training program. An inspection includes those activities undertaken to specifically determine the presence or location, or to assess the condition of, friable or non-friable ACM or presumed ACM
<b>Inspector - Lead</b>	An individual who has completed an accredited training program and is licensed or certified by the appropriate State or local agency to: (1) perform inspections to determine and report the presence of LBP on a surface-by-surface basis through onsite testing; (2) report the findings of such an inspection; (3) collect environmental samples for laboratory analysis; (4) perform clearance testing; and (5) document successful compliance with LBP hazard control requirements or standards.

<b>Landfill</b>	A State-licensed or permitted disposal facility that meets municipal solid waste standards (40 CFR 268).
<b>LBP</b>	Lead-Based Paint. Any paint, varnish, shellac, or other coating that contains lead equal to or greater than 1.0 milligram per square centimeter (mg/cm <sup>2</sup> ) as measured by x-ray florescence (XRF) or laboratory analysis, or 0.5% by weight (5,000 µg/g, 5,000 ppm, or 5,000 mg/kg) as measured by laboratory analysis. (Local definitions may vary.)
<b>LCP</b>	Lead containing paint. The Consumer Products Safety Commission (CPSC) definition for consumer use; that is, paint or other surface coating material containing lead or lead compounds, where the lead content (calculated as lead metal) exceeds 0.06% by weight (600ppm) of the dried paint film (16 CFR 1303).
<b>Lead</b>	Includes metallic lead and inorganic and organic compounds of lead.
<b>Medical Surveillance</b>	A periodic comprehensive review of a worker's health status. The required elements of an acceptable medical surveillance program are listed in the OSHA standards for asbestos and lead.
<b>µg or Micrograms</b>	The prefix micro- means 1/1,000,000 (or one-millionth); a microgram is 1/1,000,000 of a gram and 1/1,000 of a milligram.
<b>mg or Milligram</b>	The prefix milli- means 1/1,000; a milligram is 1/1,000 of a gram.
<b>NESHAP</b>	National Emission Standard for Hazardous Air Pollutants. EPA Rules under the Clean Air Act, 40 CFR 61 Subpart M. The Asbestos NESHAP is intended to minimize the release of asbestos fibers during renovation, demolition, and disposal activities.
<b>NLLAP</b>	National Lead Laboratory Accreditation Program. Requirements, specified by the EPA, for accreditation for the lead analysis of paint, soil, and dust matrixes.
<b>NVLAP</b>	National Voluntary Laboratory Accreditation Program. Third party accreditation program administered by the National Institute of Standards and Technology (NIST). 15 CFR 285 establishes accreditation criteria, which includes the PLM Test Method and TEM Test Method.
<b>Non-Friable</b>	Any material which, when dry, cannot be broken, crumbled, pulverized, or reduced to powder by hand pressure.
<b>Owner</b>	A person, firm, corporation, guardian, conservator, receiver, trustee, executor, government agency or entity, or other judicial officer who, alone or with others, owns, holds, or controls the freehold or leasehold title or part of the title to property, with or without actually possessing it. This definition includes a vender who possesses the title, but does not include a mortgagee or an owner of a reversionary interest under a ground rent lease.
<b>PACM</b>	Presumed Asbestos-Containing Material (PACM). Materials assumed to contain asbestos but not laboratory tested. OSHA further defines PACM thermal system insulation and surfacing material found in buildings constructed no later than 1980.

<b>Paint Removal</b>	An abatement strategy that entails the removal of lead-based paint from surfaces. For lead hazard control work, this can mean using chemicals, heat guns below 1,100 °F, and certain contained abrasive methods. Open flame burning, open abrasive blasting, sandblasting, water blasting, and extensive dry scraping are prohibited paint removal methods. (Methylene chloride paint removers and dry scraping are also not recommended.)
<b>PEL - Asbestos</b>	Permissible Exposure Limit. Airborne fiber concentration limit of 0.1 fiber per cubic centimeter of air as an eight hour time weighted average.
<b>PEL - Lead</b>	Airborne lead concentration limit of 50 µg/m <sup>3</sup> calculated as an eight hour time weighted average
<b>PLM</b>	Polarized Light Microscopy. A method of analysis using a light microscope to identify the chemical or mineral types of samples, including the concentration of asbestos in bulk materials. Used by EPA for AHERA and NESHAP, and by OSHA to see if asbestos is involved in a project.
<b>Project Designer - Asbestos</b>	An individual who has completed EPA/AHERA accredited training on planning and designing asbestos abatement projects and response actions.
<b>Project Designer - Lead</b>	An individual who has completed an accredited training program on planning and designing lead-based paint abatement projects.
<b>PWL</b>	Paint with Lead. Paint with any detectable concentration of lead is referred to as “paint with lead” in this PWO Guide, to indicate when OSHA standards apply.
<b>Quality Assurance (QA)</b>	An integrated system of activities involving planning, quality control, quality assessment, reporting, and quality improvement to ensure that a product or service meets defined standards of quality within a stated level of confidence.
<b>Quality Control (QC)</b>	The overall system of technical activities whose purpose is to measure and control the quality of a product or service so that it meets the needs of users. The aim is to provide a level of quality that is satisfactory, adequate, dependable, and economical.
<b>RCRA</b>	Resource Conservation and Recovery Act. The primary Federal statute governing waste management from generation to disposal. RCRA defines the criteria for hazardous and non-hazardous waste.
<b>Regulated Area - Asbestos</b>	An area where Class I, II, and III asbestos work is done, and any adjoining area where debris and waste from such work accumulate.
<b>Regulated Area - Lead</b>	Designated area where lead airborne concentration may exceed the action level. Can also be called a lead control area or boundary.
<b>Risk Assessor</b>	An individual who has completed an accredited training program and is certified to: (1) perform risk assessments; (2) identify acceptable abatement and interim control strategies for reducing LBP hazards; (3) perform clearance testing and reevaluations; and, (4) document the successful completion of LBP hazard control activities.
<b>Target housing</b>	Housing constructed prior to 1978; except housing for the elderly or persons with disabilities (unless a child who is less than 6 years of age resides or is expected to reside in such housing), and any 0-bedroom dwelling.

<b>TCLP</b>	Toxicity Characteristic Leaching Procedure. A laboratory test to determine if excessive levels of lead or other hazardous materials could leach from a sample into groundwater; usually used to determine if waste is hazardous based on its toxicity characteristics.
<b>TEM</b>	Transmission Electron Microscopy. Use of an electron microscope to find and analyze the concentration of airborne or bulk asbestos fibers and structures. Distinguishes among asbestos and other materials. Used to determine clearance levels.
<b>WSR</b>	Waste Shipment Record. The shipping document, originated and signed by the waste generator, used to track and substantiate the disposition of asbestos-containing waste material.
<b>XRF Analyzer</b>	X-ray Fluorescence Analyzer. An instrument that determines lead concentration in milligrams per square centimeter (mg/cm <sup>2</sup> ). The two types of XRF analyzers used are, direct readers and spectrum analyzers. The term XRF analyzer only refers to portable instruments manufactured to analyze paint, and does not refer to laboratory-grade units.